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4 SELECT COMMITTEE TO INVESTIGATE THE
5 JANUARY 6TH ATTACK ON THE U.S. CAPITOL,
6 U.S. HOUSE OF REPRESENTATIVES,
7 WASHINGTON, D.C.

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11 DEPOSITION OF: LAURA COX

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15 Tuesday, May 3, 2022

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17 Washington, D.C.

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20 The deposition in the above matter was held via Webex, commencing at 10:03

21 a.m.

1 Appearances:

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4 For the SELECT COMMITTEE TO INVESTIGATE

5 THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

6

7 [REDACTED] PROFESSIONAL STAFF MEMBER

8 [REDACTED] SENIOR INVESTIGATIVE COUNSEL

9 [REDACTED] SENIOR INVESTIGATIVE COUNSEL

10 [REDACTED] PROFESSIONAL STAFF MEMBER

11

12

13 For THE WITNESS::

14

15 MIKE COX

16 MICHAEL CUMBO

17 DAVID WARRINGTON

18 ERIN POTTER

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1 Mr. [REDACTED] Let's go on the record. It's 10:04 a.m. on May the 3rd, 2022, and
2 this is a deposition of Ms. Laura Cox conducted by the House Select Committee to
3 Investigate the January 6th Attack on the United States Capitol pursuant to House
4 resolution 503.

5 At this time, I'd ask you, Ms. Cox, to please state your full name and spell your last
6 name for the record.

7 The Witness. Laura Louise Cox, C-o-x.

8 Mr. [REDACTED] Okay. And I understand that you have your husband, who's also
9 representing you, in the room with you today. Can you please identify him and spell his
10 name for the record.

11 The Witness. Michael Anthony Cox, C-o-x.

12 Mr. [REDACTED] And, Mr. Warrington, I see you and a few from your firm are on.
13 Could you please introduce yourself and introduce the others from your firm.

14 Mr. Warrington. Yes, David Warrington and Michael Columbo, attorneys for
15 Ms. Cox, and our legal assistant, Erin Potter.

16 Mr. [REDACTED] Great. Thank you. Good morning, everyone.

17 This is going to be a staff-led deposition, but if any members of the select
18 committee decide to join, they may; and if they do, I will try to let you know when I notice
19 their appearance so that you're aware of it as well. And if they do have any questions,
20 what would typically happen is they would turn on their cameras and I would defer to
21 them, give them the floor.

22 In the room today, here, me, my name is [REDACTED] I'm a senior investigative
23 counsel for the select committee, along with [REDACTED] professional staff member
24 for the committee. You'll notice if you're on the Webex platform that there are a
25 number of other people, including the official reporters, as well as [REDACTED], who is a

1 senior investigative counsel for the committee as well.

2 Under the House deposition rules, neither committee members nor staff may
3 discuss the substance of your testimony that you provide today unless the committee
4 approves its release, and you and your attorney will have an opportunity to review the
5 transcript. And I'll be in touch with Mr. Warrington about that if that's something you or
6 he would like.

7 Before we begin though, I do want to go over a few ground rules. We are going
8 to follow the House deposition rules that were provided to you with the subpoena. As I
9 mentioned, there's official reporters who are on and they're going to be taking the official
10 record of this deposition. Please wait until each question is completed before you begin
11 your response, and we will try to wait until your response is complete before we ask our
12 next question and this should make things easier for them. The stenographer, of
13 course, can't record nonverbal responses, such as shaking your head, so it is important
14 that you answer each question with an audible, verbal response.

15 Ms. Cox, we ask that you provide complete answers based on your best
16 recollection. If the question that I ask is not clear, please ask for clarification. I'd be
17 happy to clarify. I'd much rather you answer a question that you understand than try to
18 answer one that you don't.

19 Also, if you don't know the answer to something, please say so, which you are
20 under oath, so if you do recall, you do have an obligation to provide that information to
21 the committee.

22 You may also refuse to answer a question to preserve a privilege recognized by
23 the select committee. And if you refuse to answer a question based on privilege, staff
24 may either proceed with the deposition or seek a ruling from the chairman on the
25 objection. If the chairman overrules such an objection, you would be required then to

1 answer the question.

2 I also want to remind you that it is unlawful to deliberately provide false
3 information to Congress. And because this deposition is going to be under oath,
4 providing false information could result in criminal penalties for perjury for providing
5 false information. I'm not suggesting that you would do so, but that is a warning that
6 we give to everybody. Do you understand that, Ms. Cox?

7 The Witness. I do.

8 Mr. [REDACTED] Okay. Is there any questions about the information -- or, excuse
9 me, are there any questions about any of the information or ground rules that we've just
10 gone over?

11 The Witness. No.

12 Mr. [REDACTED] All right. And at this time, Ms. Cox, if you don't mind, standing
13 and raising your right hand to be sworn.

14 The Witness. You're not going to see my head. Like this?

15 Mr. [REDACTED] That's fine. Thank you, Ms. Cox.

16 The Reporter. Do you solemnly declare and affirm under penalty of perjury that
17 the testimony you are about to give will be the truth, the whole truth, and nothing but
18 the truth?

19 The Witness. I do.

20 Mr. [REDACTED] All right. And we'll jump in in just a moment, but logistically, let us
21 know if you need any breaks throughout the deposition -- that's completely fine -- for
22 comfort, for food, or otherwise, or if you need to speak with your attorney.

23 And I would just note that it doesn't seem like you're in the same place as your
24 attorney, so if you do want to consult with them, I've found it best if you turn off your
25 video and your microphone. That way we have no chance of overhearing any

1 communications that you might want to have in private. But I'll defer to you on how
2 best you want to handle that.

3 Okay. Is there anything before we get into the substance, Mr. Warrington or
4 Ms. Cox?

5 Mr. Warrington. Nothing from us.

6 The Witness. No.

7 BY MR. [REDACTED]

8 Q Okay. So, Ms. Cox, you are here or appearing here pursuant to a subpoena,
9 and part of that subpoena required you to look for documents and provide any
10 documents that were responsive to a schedule of requests attached to the subpoena.
11 Did you look for documents that were responsive to the request in the subpoena?

12 A I did.

13 Q Okay. And I just want to go through some of those. We have received a
14 number of documents through counsel, Mr. Warrington and Mr. Columbo. But just to
15 specify, we understand that you have, or at least had an email address between roughly
16 the time of the November 2020 election, so we're talking about, maybe, October 2020 up
17 and through January 2021. We understand you had an email address through the
18 Michigan GOP. Did you search that email address for documents that were responsive?

19 A Yes, we did.

20 Q Okay. And then I also understand that you had a [REDACTED] -- at least a
21 [REDACTED] account and a [REDACTED] account. Did you search both of those accounts for
22 documents responsive?

23 A Yes, we did.

24 Q Okay. And did you search any electronically stored information from your
25 computer, cell phones, tablets, or otherwise?

1 A Yes, we did.

2 Q Okay. And specifically, did you search a cell phone that you would have
3 been using around that time, so, again, November 2020 through January 2021?

4 A Yeah, we did. Yes, we did.

5 Q Okay. And did you provide all that information to your attorneys for
6 production to the select committee as appropriate?

7 A Yeah, we did that through the attorney's vendor. So it wasn't just me doing
8 it, it was actually somebody with expertise.

9 Q Okay. And are you aware of any documents that you withheld from the
10 committee based on -- that were responsive but based on some kind of privilege or other
11 reason to withhold?

12 A Am I aware of any --

13 Q Correct.

14 A -- specifically? I think there might have been some attorney-client, but I
15 don't know what was withheld.

16 Q Okay.

17 A It would've been a decision that the attorneys made.

18 Q Okay. And, Mr. Warrington, to the extent there were any, we can talk
19 about that offline.

20 Okay. So, Ms. Cox, I think it would be helpful if you'd start by giving us a general
21 sense of your background.

22 A Of -- I'm sorry, like general sense, I live in Michigan. I've lived here my
23 entire life. I -- you mean you want, like, my career background?

24 Q Sure, yeah, employment history. That'd be helpful.

25 A Okay. I have four children. I'm married with four children. I have

1 graduated from Michigan State University with my master's in criminal justice research.
2 I was a Federal agent for about 12-1/2 years with the United States Customs Service,
3 which is now ICE, I believe. They went through a couple different names.

4 Then I took some time off to raise my very young children and got active in
5 politics. My husband ran for office, and I really got the political bug. I enjoyed
6 grassroots activities and decided to run for a Wayne County commissioner position.

7 I was in that elected position for 10 years, so that was five 2-year terms, and
8 decided to run for State representative. I thought it would be interesting to do a
9 different position in politics at the State level. And so, I ran and held two State
10 representative positions -- 2 years, sorry, and then I was elected into the chairman of the
11 Michigan Republican Party in 2019.

12 Q And when did you -- or are you still chairman of the State Republican Party in
13 Michigan?

14 A I'm not. My term ended in February 22nd or 23rd of 2021.

15 Q Are you currently employed?

16 A I'm employed by my husband's law firm. I'm not a lawyer. I do
17 administrative work.

18 Q You mentioned the Wayne County commission, doing that for about
19 10 years. Did that have any election-related responsibilities?

20 A I was on the commission, so there were 15 commissioners, and I was elected
21 for office. We did fund the clerk's office, but I didn't run elections. I was not
22 responsible for running elections.

23 Q Okay. All right. So I want to jump into the presidential election from
24 November of 2020. Did you have any role with respect to the Trump-Pence reelection
25 campaign?

1 A Well, I was the chairman of the Michigan Republican Party, so we worked
2 with the President's campaign to get him and Republicans running up and down the ballot
3 in the State of Michigan.

4 Q Did you have any formal title or responsibilities with the campaign itself
5 other than, you know, whatever you might have done with the Michigan GOP?

6 A I might have -- I didn't have -- I don't believe I had official title.

7 Q Okay. You're hesitating. Is there some role that you took on with respect
8 to the campaign separate from your responsibilities with the GOP?

9 A I didn't do anything separately. I did do, like, a Trump -- Women for Trump
10 bus trip, but as my role as the Michigan Republican Party chair.

11 Q When was that?

12 A Oh, boy. I don't remember.

13 Q Let me put it this way, was it around January of 2021?

14 A No. No, it was -- it was -- it was before -- it was during the election --

15 Q Okay.

16 A -- cycle.

17 Q During the election, meaning before people voted --

18 A Yes.

19 Q -- in person on November 3rd? Okay.

20 A Yes, sir.

21 Q Did you have any direct interactions with President Trump during the
22 campaign? And the period I'm most interested in would be, again, in October 2020
23 through January 2021.

24 A I met the President, I believe, twice at a meet-and-greet for a photo. Hello,
25 Mr. President, this is, you know, my son, whatever. But I -- I think it was two times, both

1 photo ops.

2 Q Okay. I saw in your tweets that it looks like you were at the White House
3 Christmas party in December. Was that one of the times you met the President?

4 A I did not meet him that time.

5 Q Okay. What about other than personal, in-person meetings, did you ever
6 talk to the President during that period?

7 A I did not.

8 Q And in those -- those photo ops that you just described, did you say anything
9 or did you have any discussions about the election in Michigan, either before the election
10 took place or afterwards?

11 A It would be really casual within probably 2 minutes, how is it going in
12 Michigan, how is Michigan looking, that kind of casual conversation.

13 Q You mentioned coordinating with the campaign, maybe "coordinating" is not
14 the right word, but working with the campaign to some degree. Can you tell us about
15 that, like who did you interact with before the election with -- from the campaign?

16 A Well, we mostly worked with the RNC, the Republican National Committee,
17 but sometimes we would have different interactions and during the campaign cycle.
18 There was a Sean -- his name is escaping me right now. Sean was a lawyer that was
19 working in -- part time in our office that did Election Day operations. I can't --

20 Q Is that Shawn Flynn?

21 A Yes. Thank you. I'm sorry. Yes.

22 Q No, that's fine.

23 A It's the -- I have a brain cloud sometimes.

24 Q It's quite all right. It's been a while. I completely understand.

25 Other than Mr. Flynn, was there anybody -- anybody else you primarily worked

1 with from the Trump campaign?

2 A I mean, there were different variant people here and there. I didn't have
3 established meetings or conversations with people from the campaign.

4 Q Okay. You mentioned working with the RNC. Tell us about that. Who
5 would you work with with the RNC? And this is -- if we could focus on the preelection
6 period, so before November 3rd?

7 A I mean, we had a regional director, John Black. That was usually the point
8 of contact if there was an event with the President or the Vice President. He was kind of
9 the point man to set it up and work through the logistics and what was expected from our
10 office, you know, basically finding a place, getting drivers, getting volunteers to work the
11 events, those kinds of things.

12 So JB was -- we called him JB but it was John Black -- we -- he was basically the
13 main contact from the RNC, but we would have intermittent contacts and
14 communications with the legal team as well as Ronna. I mean, part of it is we know
15 Ronna before she was chair of the RNC, so her ability to reach out or answer a question, I
16 think she's just very -- an open chairman, so we would -- I would sometimes talk to her
17 too. But usually, we worked it out where we would work with contacts within the RNC.

18 Q And Mr. Black, was he based in Michigan or was he in Washington or
19 somewhere else?

20 A No, I think he was somewhere else. So he just had a region, like he had
21 several States. I don't remember the breakdown of his region. I just know he was our
22 regional director. And then we had some other, like, administrative folks that we would
23 deal with as well for different things.

24 Q Now, fast forwarding to Election Day, what was your role, if any, with
25 respect to the election actually taking place, people meeting, counting votes, casting

1 votes, et cetera?

2 A Election Day, I mean, I'm kind of there to oversee the election. We had a
3 war room of sorts in Lansing set up with volunteer lawyers. We were fielding calls,
4 making sure people that were volunteers that were supposed to show up did, and if they
5 didn't, trying to find replacements, getting-out-the-vote activity. All those kinds of
6 things that culminate on Election Day we had a role, as well as working with all the
7 different campaigns that had roles.

8 Q I understand there are positions that are at least colloquially known as poll
9 watchers. Did you act as a poll watcher at all on Election Day in November of 2020?

10 A I did not.

11 Q Okay. Did you have any role in counting ballots in the November election?

12 A No, I did not.

13 Q In that war room you described in Lansing, and forgive me, but were you
14 there personally in the war room that day, November 3, 2020?

15 A I was in and out.

16 Q Did you have any contact with elected officials on November 3rd?
17 Nationally -- and excuse me, national elected officials, so Members of Congress, the
18 President or otherwise?

19 A I can't swear to it, but I believe I tried to call some Congressmen to
20 congratulate them on Election Day, if it looked like they were, you know, the definitive
21 winner.

22 Q And on Election Day, or in the days just following, so the 2 or 3 days
23 following Election Day, did you become aware of claims of election fraud or irregularities
24 in Michigan?

25 A Yes.

1 Q How did you receive those claims of fraud or irregularities?

2 A I believe I found it out through my staff or through, you know, people calling
3 me. I think I had a different information coming from different people different ways.

4 Q Okay. And in those early days, so Election Day and, again, the maybe 2 or
5 3 days afterwards, what do you remember of the types of claims that were coming in
6 about election fraud or irregularities in Michigan?

7 A Could you clarify? I don't understand what you mean by --

8 Q Yeah, just what do you remember being alleged about fraud or irregularities
9 in those initial 72 hours on Election Day and afterwards?

10 A I think the -- probably the most obvious one was the Antrim County
11 computer issue with the flipping of the votes. That was the biggest one that, you know,
12 I think -- that's -- because there was such a vote shift, and then the other one was the
13 absentee ballot counting in Detroit, which, you know, made national news as well.

14 Q And that absentee ballot counting, are you talking about the counting that
15 was happening at the TCS center in Detroit?

16 A Yes. Yes. And, you know, Detroit absentee ballot counting has been an
17 issue for years and years, I would say decades. When my husband was elected attorney
18 general, he had campaign staff down -- and it was then called Cobo Hall -- observing and
19 having issues and concerns about the way the election and the counting of ballots had
20 occurred. As well as Lieutenant Governor Gilchrist, Michigan's current lieutenant
21 governor, he unsuccessfully ran for clerk in the city of Detroit, and he, at the time, had
22 concerns. And in 2016 election, there were concerns because when you have
23 discrepancies with the ballots and the votes in precincts, you can't use them for a
24 recount. So it has been traditionally a very troublesome area that needs improvement.

25 Q And was there -- I understand there was a hotline that was set up in order to

1 take in claims of fraud or irregularity after the election by the Michigan GOP. Are you
2 aware of that hotline?

3 A I am.

4 Q Okay. Tell us about that. What was the process for receiving
5 information?

6 A Well, when you have a group of voters across the State that are concerned
7 and they needed an avenue to be able to report their concerns and we wanted to
8 streamline that, and so, we came up with the idea of having a hotline so that we could
9 take the information and then connect them with one of the volunteer lawyers across the
10 State that they could take a sworn affidavit to use that in court if it were necessary.

11 Q Okay. So when somebody called in the hotline and left a message, or
12 however they left the information, what would the Michigan GOP do with that
13 information?

14 A We would give that information to -- there was a team of lawyers set up. I
15 don't know the real specifics. I wasn't answering the voicemails. But I believe the
16 protocol was that we would take the information, the contact information and forward
17 that, connect them with a lawyer so that they could give a sworn affidavit of their
18 information.

19 Q Were these Trump campaign lawyers? Outside lawyers? Or who were
20 they, to the best of your knowledge?

21 A I don't -- I don't know. I think some of them were volunteers from the
22 State of Michigan and some were Trump lawyers.

23 Q Did the Michigan GOP have any role in fact-checking or validating some of
24 these allegations?

25 A No, sir, we did not.

1 Q Do you know who did? Was there a team that the GOP would send them
2 to? Michigan GOP, excuse me.

3 A I -- we sent them to lawyers to collect the affidavits.

4 Q Okay. All right. So, Grant, if you could pull up Exhibit 28.

5 A I have a monitor next to me that makes it bigger so I can see it, so that's why
6 I'm turning, just so you know.

7 Q Okay. Yep, that's great. And this one actually -- these are -- there's only
8 three exhibits that we just added. This is one of them. These are tweets though, so
9 I'm hopeful -- if you're able to see this?

10 A Yep.

11 Q Okay. Great. And it's cut off on ours only from the screen, but let us
12 know if you need us to move or resize so that you're able to see it.

13 A Can you move it a little bit because like the zoom things went to the side.

14 Q Yeah, let's see if we can --

15 A Yes. Thank you.

16 Q Did that help?

17 A Yeah. It just says -- I have "center" and then I can't see the rest.

18 Q Could you zoom out a bit just -- Grant.

19 A There we go. Thank you.

20 Q Does that help?

21 A Yeah, thank you.

22 Q Okay. Perfect. Okay. So that Laura Cox, this is from a Twitter account
23 @LauraCoxMI.

24 A That's me.

25 Q Okay. And you used that account in the November post-election period up

1 and through January?

2 A I did.

3 Q Okay. So this one, and it's labeled number one there, but it says
4 Republican poll challengers blocked from entering the TCF center in Detroit. This is
5 egregious. This is from November 4, 2020. Did you take the video that's included with
6 this tweet?

7 A I did not, I don't think so, no.

8 Q How did you learn about this, if you remember?

9 A It was in the news. I mean, and I had people calling me about it, and I had
10 volunteers in there. Some of my staff members went in to volunteer.

11 Q Did you ever come to learn that the counting facility, TCF center, was full; in
12 other words, they weren't accepting anybody, not just Republicans but not Democrats as
13 well?

14 A I don't think I -- no, I don't think so.

15 Q If you go to number three, and I'm -- this is on page three, that top one, it
16 says, "Republicans have been shut out of the process in Detroit because of Benson and
17 Winfrey's partisanship in flagrant violation of Michigan's election laws. I call for a full
18 investigation of the election operation in Detroit, which has been compromised to its
19 core." And then it looks like you're retweeting a tweet from the Michigan GOP, and this
20 is on November the 5th.

21 Do you remember, was there a discussion about the election laws that had been
22 violated -- or let me back up or rephrase that. What was your understanding of the laws
23 that had been violated when you tweeted this?

24 A I believe that volunteers, observers weren't allowed to come in; if they left,
25 they couldn't get back in. I believe that them boarding up the windows became

1 transparent there was allegations of ballots -- but I'm not a lawyer. It just seemed like it
2 was a -- I don't know how you want to put it -- unsettling and looked like it wasn't an
3 appropriate way to perform ballot counting.

4 Q At any of that -- at any point in that period, did you go to the TCF center in
5 Detroit?

6 A I did. You can see me --

7 Q And what --

8 A You can see me in the picture right blow that.

9 Q Okay. So, yeah, that was going to be my next question. It looks like that
10 tweet is from November the 6th. Do you remember roughly, when you first got to the
11 TCF center, what date it was?

12 A I don't. Sorry.

13 Q Do you think that this was the first time, when you tweeted on
14 November 6th, that was the first day you were there?

15 A Yeah, it was, I'm sure. I don't know if it was that date though, so I can't be
16 for certain. I'm sorry.

17 Q Okay. No, that's quite all right.

18 And if you go to number six, which I believe is on page 5, it looks like on the same
19 day, you went on the Hannity Radio Show. Do you remember doing that?

20 A I do.

21 Q Okay. Tell us about that. Why did you go on Mr. Hannity's radio show?

22 A Well, I'm the spokesperson for the Michigan Republican Party, and we
23 wanted to talk about the issues and concerns we had with how the election process had
24 went, and so I was asked to speak on his show, and I took the invitation.

25 Q Who asked you to speak on his show?

1 A I don't know. It must have been his producers.

2 Q Do you remember getting any requests from the Trump-Pence campaign to
3 appear on Mr. Hannity's show?

4 A I have a press secretary, so I don't know how the invitation -- I don't
5 remember how the invitation came about.

6 Q So my understanding is that when you went on the show you did talk about
7 the Antrim issue that you raised earlier. I think you said something to the effect of,
8 there's a glitch in the voting machines that caused approximately 6,000 votes to go to
9 Biden and the Democrats that were meant for Trump and the Republicans. Is this the
10 Antrim issue that you referred to earlier?

11 A The 6,000 votes?

12 Q Correct.

13 A Yes.

14 Q Okay. What was your understanding at this time, so, again, in the days
15 after the election, of that particular allegation related to vote flipping and voting
16 machines in Antrim County?

17 A I'm sorry, can you repeat exactly what you want again?

18 Q What was your understanding -- what caused that issue, the vote flipping in
19 Antrim County that you described earlier, so far as you understood it back then, if you can
20 recall?

21 A Well, we didn't know what the issue was, and that was the concern, that we
22 didn't know if it was a software issue or what. And so, at that time, we were very
23 concerned that this software was used in many other venues in the State for vote
24 counting.

25 Q And did you ever learn what actually caused the issue in Antrim County?

1 A Later, yes.

2 Q Okay. What did you learn later?

3 A I believe the clerk stated that they had coded something wrong in their
4 software.

5 Q And do you have any reason now to believe that that's not the case, that the
6 error was due to a clerk coding something wrong?

7 A I do not.

8 Q Now, I believe on November 5th, the President went on TV and specifically
9 mentioned Michigan and allegations of fraud or irregularities with the election in
10 Michigan. Are you aware of the speech that I'm talking about?

11 A I think I remember that speech, yes.

12 Q Okay. And just generally, do you recall ever having a role in gathering
13 information, from the Michigan GOP or other sources, to give to the campaign to support
14 the President's remarks or what he planned to say?

15 A I believe we sent any information we had of potential concerns about the
16 election. That would be our job to forward it to the RNC or any candidates. We did
17 share information back and forth. I don't recall specifically sending any information
18 specifically to anybody. I do not recall that specifically.

19 Q Okay. And that Antrim issue we just talked about, and I just want to back
20 up to that, and I apologize for going backwards, but when did you realize or learn that the
21 error in Antrim County in the vote flipping was due to the clerk's error?

22 A I don't remember.

23 Q Okay. Do you remember ever communicating that this was actually an
24 error by the clerk to anybody in the Michigan GOP?

25 A I don't remember, no.

1 Q Do you remember ever passing that information along to anybody from the
2 Trump campaign?

3 A I don't remember.

4 Q All right. If we could pull up exhibit 2 and 3, start with number 2. This is a
5 document that you provided to us, Ms. Cox. And if we go down to the bottom, it's
6 about midway through the first page there, can you see that okay?

7 A Yeah.

8 Q Okay. So that is an email from Michael Banerian to Michael Ambrosini
9 copying Tony Zammit. First question I have is, who is Mr. Banerian?

10 A Banerian is the press secretary.

11 Q And then who is Michael Ambrosini?

12 A He was the -- he was my executive director.

13 Q Who's Tony Zammit?

14 A He's the communications director.

15 Q And what this is, the subject line is updated State committee talkers with
16 intro for approval. And we're going to look at the document in just a second. But
17 what did you generally understand talking points to be, and can you tell us how talking
18 points generally were created for you?

19 A I'm sorry, I don't understand. I mean, different people would bring
20 different information in, and we would put together talking points if I was going to do
21 press or do an event. So they would be collected from information from different
22 directors in their departments depending on what I was going to -- what I was going to be
23 doing.

24 Q Okay. Eventually this email or some version of this email goes to
25 somebody named Stephanie Young. Who is that?

1 A She was my scheduler.

2 Q And how about Katherine Shaheen?

3 A Yeah, she was my administrative assistant.

4 Q At the very top, Ms. Shaheen sends it to Troy Hudson and you. Who is
5 Mr. Hudson?

6 A Political director.

7 Q For the Michigan GOP?

8 A Yes.

9 Q Okay. All right. And if we go exhibit No. 3, this is the attachment to that
10 email, State committee call talking points November 10, 2020. Tell us, what is a State
11 committee call?

12 A The State committee is basically the board of directors for the Michigan
13 Republican Party. They're individuals that are elected independently in their own
14 congressional districts, and then they serve as the general board of directors for the
15 Michigan Republican Party. They have committees and assignments.

16 Q Would you have regular meetings with the committee?

17 A Yes, we did, but we -- we did not have -- because of COVID we had not had a
18 State committee meeting for quite a while.

19 Q Did you have any role in drafting or editing these talking points, if you recall?

20 A I mean, if I'm going to say 'em, sometimes I would edit them.

21 Q Okay. What about these specifically, do you remember before this
22 November 10th call, so about a week after the election, do you remember having any role
23 in editing these?

24 A I -- like I said, sometimes I did, sometimes I didn't. I couldn't specifically say
25 if I did or didn't.

1 Q Okay. Fair enough.

2 So this talks about -- in the first point, about the fifth bullet point down, it talks
3 about elections needing to be fair, transparent, all legal votes being counted. And it
4 says, "Unfortunately it's become increasingly clear that this has not been the case in our
5 State."

6 At that point, November the 10th, were you aware of evidence that established
7 that the election was not fair in Michigan, beyond just allegations, but actually
8 establishing that you had seen, Ms. Cox?

9 A I mean, I'm in a political position. I'm not a lawyer. And I'm talking to my
10 board of directors. So there was a lot of concerns about how the election had happened
11 and occurred. I mean, it first started, which you don't even -- we haven't talked about
12 yet, is that we believed in violation of the law the Secretary of State of Michigan mailed
13 unsolicited, we believe in violation of Michigan law, unsolicited applications for absentee
14 ballots across the State. So me saying that, that is the start of what we believed was a
15 problematic election cycle.

16 Q Okay. And that issue --

17 A And that's something -- and that's something -- I'm sorry, I didn't mean to
18 interrupt you. But that's something and I talked about from the moment it occurred
19 well before Election Day.

20 Q Okay. Yeah. And that's something -- is there a distinction that you draw
21 in your mind between that type of issue, sending out absentee ballots and some of the
22 other things that you had mentioned with regard to the TCF center and Dominion voting
23 machines, are those separate in your mind?

24 A No, they're all -- it all was part of the 2020 election. It started off, we
25 believed, improperly with those applications for absentee ballots. It was the first time in

1 Michigan you can have no reason absentee ballot voting, which was, you know,
2 something that had never occurred again before Michigan. And we had -- so we had,
3 like, new election laws taking effect in this first election cycle of 2020. And we also had
4 COVID. We were dealing with a lot of issues with COVID and the pandemic in this
5 election cycle. So things were very different than a traditional election cycle.

6 Q I understand there was a lot of talk about that at the time as well.

7 Did you ever learn or were you ever aware of any evidence that established those
8 changes affected the outcome of the 2020 election in such a way that President Trump
9 actually did win the State of Michigan?

10 A Because of the absentee ballot?

11 Q Correct.

12 A I don't have any evidence of that, no.

13 Q On this -- if you go to page two of this, this talks about -- some of
14 these -- this is still that talking points document that we were looking at. If you -- at the
15 top there it talks about President Trump's performance, about how he earned more votes
16 in 2020 than 2016. It also goes through some down-ballot races, like Mr. James, and
17 then statewide candidates in congressional races.

18 Were you aware of any allegations of fraud or improprieties affecting the
19 down-ballot races in Michigan, so other than the President?

20 A Well, I think if you have concerns about -- I mean, I know John James had
21 some concerns and their campaign worked on those concerns. I don't know if it was in
22 court or whatever, but there was some concerns about that.

23 Q Okay. What about --

24 A But, I mean, if you're having some issues with ballots, and if there were -- if
25 there was a computer glitch, then it would affect other down-ballot candidates. And I

1 do believe in Oakland County, they told one person that they won and the other person
2 that they lost, and it actually -- they went to figure it out and it became reversed. And I
3 can't remember the specific office now. I'm sorry, I don't recall, but that did happen.

4 Q Okay. I guess, one of the reasons I'm asking is that like if you look in the
5 statewide candidate bullets, it says Republicans ousted Democrats, or vacant Democrat
6 seat on all university boards. And then, if you go down lower to the congressional races,
7 it says that we in Michigan protected and expanded Republican-controlled seats in the
8 House.

9 Are you aware of any claims of fraud or irregularities that affected those races, the
10 congressional delegation or the university board races?

11 A Like I said, if there were issues with ballots or issues with a computer, then it
12 would have affected other races. Do I have specifics? Do I recall any specifics?
13 There might have been some reported in those hotlines. I don't have any specifics.
14 I'm sorry, I don't.

15 Q Okay. And maybe I'll ask it a different way, but do you remember anybody
16 contesting those races in the congressional delegation or the university board races?

17 A I do not recall, no.

18 Q All right. You can take that down. Thank you, Grant.

19 I want to go now specifically to the Wayne County certification of the election.
20 On November 17, 2020, there's a meeting of the Wayne County, I believe it's called the
21 Board of Canvassers. Are you aware of the meeting that I'm talking about?

22 A I am.

23 Q Okay. And I'll just represent to you, and correct me if any of this is wrong,
24 but that initially there was a vote by the Wayne County Board of Canvassers not to certify
25 the 2020 presidential election. Then after public comment the board voted to certify.

1 And then two members, Mr. Hartmann and Ms. Palmer, published an affidavit the next
2 day trying to revoke their votes to certify. Is all of that accurate as you understand it?

3 A I believe so, yes.

4 Q Okay. Did you discuss certification with Mr. Hartmann or Ms. Palmer
5 before the vote at the Wayne County Board of Canvassers?

6 A I did not.

7 Q Okay. Do you know if anybody from the Michigan GOP did?

8 A I'm not aware.

9 Q And did you participate in that meeting, November 17th, at the Wayne
10 County Board of Canvassers?

11 A No. No, I did not.

12 Q Were you asked to participate?

13 A No, I don't think so.

14 Q Did you ask anybody if you could participate?

15 A I don't think I did, and I did something with the State Board of Canvassers. I
16 don't believe I did anything with the Wayne County.

17 Q One of the things I mentioned is that Ms. Palmer and Mr. Hartmann voted to
18 certify the Wayne County election that night, but then they published an affidavit the
19 next morning trying to revoke their vote. Do you know why they switched from voting
20 to certify and then sending out this affidavit trying to revoke?

21 A I do not, no.

22 Q Did you speak to either of them before they published their affidavits
23 seeking to revoke their vote?

24 A I might have spoken to Monica or had emails, but I did not speak to her
25 about certification, no.

1 Q Okay. Tell us about what you remember of your interactions with
2 Ms. Palmer?

3 A Well, I mean, I've known her for a while. She's a big activist in the party,
4 and I know that she was there during the TCF center debacle. I don't know if she was
5 there as a volunteer, but I know she had reported some -- a list of concerns of her
6 observations.

7 Q Okay.

8 A But that really is something, I think, separate from her certifying
9 responsibilities.

10 Q Did you ever talk to Mr. Hartmann or Ms. Palmer after their vote at any
11 point up until today about the issue of certification in Wayne County?

12 A I think I -- if I talked to them, it was just talking to them. It wasn't about
13 you should have or you shouldn't have. I don't -- I did not have those kind of
14 conversations with them, no.

15 Q Apart from any conversation of should have or should not have, did they
16 relay their experiences to you about the certification issue in Wayne County?

17 A It was a very dramatic -- yes, they did. It was a very dramatic situation, I
18 think, for both of them.

19 Q And we'll start with Ms. Palmer, but what did she tell you about that?

20 A I mean, the public comments were pretty nasty from what I hear and what
21 was reported, and I just think it was very traumatic.

22 Q Is that what she talked to you about, it was a traumatic experience?

23 A Yeah, I think they had a picture or they referenced her daughter, and there
24 was a picture of a dead body or something. I'm -- you know, there was kind of threats
25 made. She was very concerned.

1 Q Did she tell you why she decided to try to revoke her vote through that
2 affidavit?

3 A No. No. I don't know the specifics of the affidavit for either of them.

4 Q What about Mr. Hartmann, tell us about your conversations with him about
5 the Wayne County certification?

6 A Again, I -- you know, I think it was just a very stressful situation for both of
7 them, and we didn't have real specific conversations about it.

8 Q Were you aware that President Trump called them before they rescinded
9 their vote the next day, but after they voted to certify?

10 A It was -- I read about it in the news or it was reported.

11 Q Did you ever talk to them about their call with the President that night?

12 A I don't believe I did. Maybe it was like in passing, but I -- it wasn't anything
13 specific, no.

14 Q What do you remember generally about what they said in passing about the
15 call with the President?

16 A I think it was, you know, it was what it was. The President called them, you
17 know, during the political process. It was probably a little jarring.

18 Q Tell us more, what do you remember them saying? To the extent you can.
19 I mean, was it a --

20 A I really don't recall any specifics. I apologize. I just don't.

21 Q Do you remember them saying that the President, maybe not in these
22 words, but in some words suggesting to them that they rescind their vote?

23 A I don't -- that was not articulated to me. I'm not aware of that.

24 Q Okay. Did you get a general sense of the nature of the call, even if you
25 don't remember specifics? Was it, Nice to meet you? I mean, I'm just trying to

1 understand a call from the President to a county board of canvassers' participant.

2 A You and me both.

3 Mr. Warrington. [REDACTED], I just want to make clear, you're asking her to, I guess,
4 characterize a call she wasn't a participant on, so --

5 BY MR. [REDACTED]

6 Q Yeah, I'm -- just to be clear, and I appreciate that, Mr. Warrington, just your
7 sense from talking to them about what that call was about. So not asking you to
8 speculate about what Ms. Palmer thought of the call or Mr. Hartmann thought of the call.
9 Just from talking to somebody you kind of get a sense of what happened. And do you
10 remember having any sense of what that call was all about, the purpose of the call?

11 A I believe, like my lawyer said, I wasn't involved in the call, and I don't -- I
12 didn't receive a call, so I imagine it was jarring.

13 Q Okay. No, and again, I don't want you to speculate, but do you remember
14 having any sense, when you first learned about this call from talking to Mr. Palmer, or
15 excuse me, Ms. Palmer or Mr. Hartmann, what was your understanding of the call, your
16 own understanding?

17 A I don't have an understanding of the call that I wasn't a part of.

18 Q Okay. If you can pull up exhibit 28. This is going back to your tweets,
19 Ms. Cox. This is page 7, tweet number 10. All right. So this is a tweet from
20 November 17th. This is the date of the Wayne County Board of Canvassers meeting.
21 And you said, "I'm proud that, due to efforts of the @MichiganGOP and the RNC under
22 the leadership of @GOPChairwomanRonnaMcDaniel, enough evidence of irregularities
23 and potential voter fraud was uncovered resulting in the Wayne County Board of
24 Canvassers refusing to certify their election results."

25 Do you remember sending out this tweet, Ms. Cox?

1 A I must have, but I don't remember.

2 Q Okay.

3 A But I must have.

4 Q Looking at it, my understanding is that you sent this before the
5 vote -- when -- after -- between the time the board voted to not certify and then voted to
6 certify that night. Does that sound accurate, based on your recall of events?

7 A Yeah, they --

8 Mr. Warrington. [REDACTED], is there a timestamp on this?

9 BY MR. [REDACTED]:

10 Q There's not.

11 Does that sound accurate based on your recall of events that you would've sent
12 this between the vote to not certify and then to certify?

13 A Yeah, I don't know. I mean, I assume that I'm reporting something. I
14 didn't, like, say it before it happened, so, yes.

15 Q Okay. Do you know who Jenna Ellis is?

16 You can take this down.

17 A I think she's a lawyer that works with Rudy Giuliani.

18 Q Did you ever have any communications or meetings with Ms. Ellis in that
19 period between November 3, 2020, and January 20, 2021?

20 A When Mayor Giuliani came to Michigan she was with the mayor's group of
21 individuals that were with him.

22 Q And that would've been in early December. Is that right?

23 A Yes.

24 Q Did you ever talk to her before then?

25 A I don't believe so. I don't recall talking to her. I follow her on Twitter.

1 Q In the tweet we just looked at, it was retweeting a statement by -- that you
2 have released on the Wayne County Board of Canvassers meeting that I'll represent to
3 you is very similar to a statement put out by Jenna Ellis. Do you remember anybody
4 associated with Mr. Trump and his campaign or Mr. Giuliani drafting any statements for
5 you in the post-election period?

6 A No. No.

7 Q Do you remember receiving any suggestions that you issue statements from
8 Mr. Trump and his campaign or Mr. Giuliani and his team?

9 A I don't recall it. I mean, I don't really write my statements. My team
10 does. If they are looking at other people's material and basing the statements on those,
11 the tweets on those, that wouldn't be farfetched.

12 Q Okay. I understand that this Wayne County certification, November 17th,
13 that Ms. Palmer offered to certify all of Wayne County results except the city of Detroit.
14 Are you aware of that?

15 A Yeah. That was the city of Detroit, and actually, my hometown of Livonia
16 was a concern as well.

17 Q Okay. I believe Ms. Palmer offered to certify all of Wayne County except
18 Detroit, specifically though. Are you familiar with that?

19 A I -- I remember Livonia was in the mix because it was my hometown,
20 because there was some concerns with the absentee ballot balancing as well as in my
21 city, as well as city of Detroit.

22 Q Okay. Were you involved in any discussions with Ms. Palmer about her
23 offer to certify, or suggestion, rather, to certify Wayne County except Detroit?

24 A No.

25 Q Now, the election had been called, at least by the press, on November 4th,

1 the day after the election in Michigan when now-President Biden had a 70,000-vote lead
2 and he eventually won by around 150,000 votes. At the time the Wayne County Board
3 of Canvassers met, had you personally seen any evidence of fraud or irregularities that
4 would've changed the outcome of the election?

5 A Personally --

6 Q Correct.

7 A -- I just had -- I had the Antrim County, the computer issues. I had reports
8 of Oakland County, the absentee -- then the TCF center, that was a huge issue and
9 concern. And TCF is in Wayne County, just for the record, so you know.

10 Q Okay. And so you'd seen those allegations?

11 A Yeah. They were very highly reported, yes.

12 Q All right. Did you know that around that time, the Trump campaign had
13 determined that the issue with voting machines at Antrim County and software used that
14 there wasn't a lot -- or there was no -- they couldn't be validated? Did you know that at
15 the time?

16 A That there were concerns --

17 Mr. Warrington, [REDACTED], could you repeat that question? I'm a little unclear on
18 the question.

19 BY MR. [REDACTED]

20 Q Yeah. Sure, absolutely. Happy to.

21 Were you aware around that time, around the 17th of November, the Trump
22 campaign had looked into issues related to Dominion and Smartmatic in Antrim County,
23 and determined that they couldn't be validated? Did you ever hear anything about that,
24 the campaign's conclusions on that?

25 A No, I don't -- I don't -- I don't recall.

1 Q Okay.

2 If we go to exhibit No. 7, this is a document you provided to us.

3 Mr. Columbo. [REDACTED], I'm sorry. Could you clarify, are you asking whether
4 the allegations couldn't be validated, or whether the results in the machines couldn't be
5 validated?

6 Mr. [REDACTED]. No, my question was whether Ms. Cox is aware that the campaign
7 had determined they couldn't validate these claims about vote switching and Smartmatic
8 related to Antrim County.

9 Mr. Columbo. Okay. I just want to be clear that it was the allegations that
10 couldn't be validated as opposed to the results.

11 Mr. [REDACTED]. Correct. That's right, the allegations about vote flipping in Antrim
12 County.

13 Mr. Columbo. And by not validated, you mean they couldn't determine it one
14 way or the other?

15 Mr. [REDACTED]. So my question was whether she was aware of any -- I guess I'll say
16 it like this: Any campaign -- any conclusions made by the Trump campaign about the
17 veracity of the claims related to Antrim County.

18 The Reporter. And can I get who was speaking for the record, please.

19 Mr. Columbo. I'm sorry. That was Mike Columbo.

20 Mr. [REDACTED]. And, Mr. Columbo, just -- we do have a rule to help the reporters
21 that if you are going to speak, please come on camera if you're able.

22 Mr. Columbo. Sure. Will do. Sorry about that.

23 Mr. [REDACTED]. That's quite all right.

24 BY [REDACTED]

25 Q Okay. So I do want to move on. If we look at exhibit No. 7, again, this is a

1 document that you provided to us. If we go down to the bottom, this was from
2 somebody named Allen Amber. Do you know who that is?

3 A I do.

4 Q Who is that?

5 A He's a donor to the party.

6 Q Okay. He sends it to you, Ms. Young, Mr. Ambrosini. We've already
7 talked about them. And then you forward this to somebody named Megan Ostrow.
8 Who is that?

9 A She was the finance chair.

10 Q And then she responds to you at the top with a draft response to Mr. Amber.

11 A Correct.

12 Q Why was she drafting a response for you, the finance chair?

13 A Because she helps me with communication back and forth to donors, and I
14 just kind of wanted her to give me what her idea was to -- how to respond to him, since it
15 was, you know, a pretty interesting email with -- his opinions were pretty strong.

16 Q Okay. Do you remember sending this as your response? I don't believe
17 we have that document.

18 A I don't believe I emailed him back. I can't swear to it, but I think I might
19 have just called him.

20 Q Now, in this email at the top, the draft, if you can see the whole thing, it
21 says, "Our legal team will continue to investigate every report we've received of potential
22 fraud whether the presidential race gets overturned or not. We do know that this is an
23 issue we must address. Even if one vote is miscounted or illegal, that is one too many,
24 and we must have fair and free elections."

25 It goes on and there's some information before that. I think what's notable here

1 is what you didn't say or what the draft didn't say. I should be precise. It doesn't say
2 that, you know, there was widespread fraud that would change the outcome of the
3 election.

4 Were you deliberate at this point, November 19th, or careful about not making
5 claims like that that there was sufficient widespread fraud to change the outcome of the
6 election?

7 A Well, this was written by Megan to me, so that was her draft. I really don't
8 know what went into or why she did her draft.

9 Q Okay. But what about you, just at that time, did you make a choice, were
10 you deliberate in not saying that there was widespread fraud sufficient to change the
11 outcome of the election?

12 A I wanted to be reasonable, and I wanted to let the process go through. It
13 was still pretty early in the process, and we were getting a lot of information from a lot of
14 different sources, and so, I wanted to be prudent.

1 [11:04 a.m.]

2

BY MR. [REDACTED]

3

Q All right. You can take that down. You mentioned earlier the State,
4 excuse me, the State Canvassing Board, I understand that they met around November the
5 23rd of 2020. Is that right?

6

A I don't recall the date, but they did meet in late November.

7

Q Okay. What was your role, if any, with respect to the meeting at the State
8 Canvassing Board in Michigan?

9

A As the public just like anybody else.

10

Q As a citizen?

11

A Yes, sorry, as a citizen.

12

Q Okay.

13

A I had an obligation as the chairman of the party, I believe, but I don't have
14 any role.

15

Q So when you appeared there, you were doing it as a citizen, not on behalf of
16 the Michigan GOP. Is that fair?

17

A I was doing it as a citizen as my role as the Michigan Republican Party chair.
18 But I believed I did it as Laura Cox.

19

Q As opposed to?

20

A I don't think they care what your title is.

21

Q I see. There is a lot of public reporting about the efforts to have Mr. Van
22 Langevele or Mr. Shinkle not certify the results of the 2020 election at that meeting of the
23 State Canvassing Board. Are you aware of any of those -- any outreach to Mr. Van
24 Langevelde or Mr. Shinkle not to certify the election?

25

A I believe that -- I don't believe I talked to Erin at all. And I might have had a

1 conversation with Shinkle. He was -- he was on the State committees, a strong activist
2 in the party for a long time.

3 But if I did talk to him, it would be basically, like, where are you at, what are you
4 going to do, what do you see, you know, what do you feel like? But I can't say yes or no
5 if I did.

6 Q Do you recall ever encouraging Mr. Shinkle not to certify the election?

7 A I may or may not have. I think it was just more like what are you doing and
8 based on what. And to be honest, I don't specifically recall. I just know that we talked.
9 Probably often he would come into the office a lot. He brought flowers every week to
10 the office. Like he was a frequent visitor to the headquarters.

11 Q You mentioned that you don't think you spoke with Mr. Van Langevelde, did
12 you try to contact Mr. Van Langevelde about the State Canvassing Board meeting in
13 November?

14 A I don't believe I did. I may have just to see where he was at. I mean, me
15 having a conversation with somebody doesn't mean that I'm trying to tell them, lobby
16 them one way or another.

17 I mean, I was an elected official for 14 years and, actually, 16 if you include the
18 party chair, and I oftentimes like to talk to people, and people talk to me about where I
19 stand on issues. But I don't tell people what to do. And I really have no authority to
20 tell anybody what to do, and I recognize that.

21 Q Are you aware of anybody in particular who was [audio malfunction] Mr.
22 Shinkle not to certify the election?

23 A I'm not aware. I don't recall.

24 Q Did anyone encourage you to reach out to Mr. Shinkle or Mr. Van
25 Langevelde?

1 A Not that I recall. I mean, we sent a letter. I sent a letter to the Board of
2 Canvassers which would express our opinion on what --

3 The Reporter. I didn't hear the last part of the witness' answer.

4 BY MR. [REDACTED]

5 Q Ms. Cox, can you repeat the last part of your answer?

6 A I sent a letter to the State Board of Canvassers with Chairman McDaniel,
7 asking them to conduct an audit of the election. And I believe it was asking them to
8 defer any certification access for a couple of weeks.

9 Q And I'll just ask the reporter if you're able to hear Ms. Cox's answer for that?

10 The Reporter. Yes, sir, I did.

11 BY MR. [REDACTED]

12 Q Very good. Thank you.

13 So tell us about that letter. And we have that as exhibit No. 8, so we can pull it
14 up if that's helpful.

15 A Sure.

16 Q So whose idea was this to send a letter to the Michigan Board of Canvassers,
17 asking them to delay certification?

18 A I don't know whose idea it was. I think it was an efficient way to express
19 our concerns about the election in a different way instead of just talking to the press or
20 talking to activists. It's an efficient way to, you know, articulate your ideas, your
21 concerns.

22 Q Do you remember talking to the RNC about it. I mean, this was, I think, on
23 both RNC and Michigan GOP letterhead?

24 A Yeah.

25 Q So who did you talk with RNC about it?

1 A I believe we talked with Justin Riemer who was the RNC legal counsel.

2 Q Is he the one who brought it up for the first time, the idea of sending a
3 letter?

4 A I, honestly, don't recall whose idea it was or where it became, you know -- I
5 don't recall the specifics.

6 Q Okay. If we can pull up exhibit No. 8. I'll show you the letter, if you can
7 zoom out a bit. There we go. Did you write this letter?

8 A We might have had some edits to the letter.

9 Q Do you know who provided the first draft?

10 A I do not recall. I'm sure it was probably Justin, but I don't know.

11 Q Justin being Mr. Riemer from the RNC?

12 A Yes.

13 Q When you say we may have provided some edits, who do you mean by
14 "we"?

15 A Well, I would have had my lawyer, probably, review it.

16 Q Lawyer at the Michigan GOP?

17 A Uh-huh.

18 Q Okay.

19 A Yes.

20 Q And who is that?

21 A Stewart Sandler.

22 Q My understanding is that for the Board of Canvassers at the county and State
23 level in Michigan, it's a ministerial function, counting votes -- I believe that's where Mr.
24 Van Langevelde came down, his decision to certify -- and that specifically not supposed to
25 look into allegations of fraud or irregularities. Is that your understanding of the role of

1 the Board of Canvassers in Michigan?

2 A I understand that their job is to certify election results, and there is a process
3 that they go through. I'm not a Board of Canvassers member, nor have I ever served in
4 that role, so I don't really know the specifics of their job.

5 Q Okay. Do you know whether they have a role in evaluating claims of
6 election fraud or irregularities?

7 A I would assume that they should if -- I don't know.

8 Q Okay. So separate from whether they should or not, just your
9 understanding of whether they do have that function, you don't know?

10 A No, I don't know.

11 Q Okay. Do you remember any discussions around the time that the
12 Michigan GOP and RNC sent this letter about whether this was the role of the Board of
13 Canvassers at all to look into claims of fraud or irregularities?

14 A I do not.

15 Q If we go to exhibit 28, page 10.

16 This is tweet no. 14. That's from November the 23rd, and you say, Waiting for
17 my opportunity to speak at the State Board of Canvassers meeting on protecting integrity
18 of our elections in Michigan.

19 I believe that's a picture of you waiting to appear via Zoom at the canvassers
20 meeting. Is that right?

21 A Yes, sir.

22 Q And did you speak to the State Board of Canvassers at that State Board of
23 Canvassers meeting?

24 A Yeah, I mentioned that just a few minutes ago, that I spoke to them as Laura
25 Cox.

1 Q Yeah. And do you remember the issues you raised with them?

2 A I do remember talking about the concerns we had with transparency.

3 Q I believe you mentioned the TCF Center issue, specifically, during your
4 appearance. Do you recall that?

5 A Yes.

6 Q And, broadly speaking, you mentioned that Republican challengers had been
7 shut out of the ballot counting process there. Is that accurate as you recall it?

8 A Yes, I don't have the statement in front of me, but that was one of the
9 concerns.

10 Q Okay. Now, by that time in November, the 23rd, were you aware that two
11 court cases in Michigan had dealt with issues related to the TCF Center.

12 That being Judge Kenny's decision in Stoddard v. Detroit in Judge Kenny's decision
13 in Constantino. Were you aware of those court cases that --

14 A There were a lot of court cases, so I don't remember which one was which,
15 but I was aware that there was a lot of court cases going on after the election.

16 Q Okay. And were you aware, though, that by the time the State canvassers
17 met and you appeared there that Judge Kenny had dealt with these issues related to
18 early -- some of the issues at the TCF Center about challengers not being given access or
19 being -- given the opportunity to observe? Did you know that?

20 A Yeah, you know, Judge Kenny -- actually I know him personally. He's a
21 resident of Livonia. He's a trial court judge, so he is not the final word, I do know that.

22 And I'm not a lawyer, but I understand that these cases were getting appealed and
23 kind of working their way through the judicial system.

24 Q Okay. So what effect if at all did his decisions about issues at the TCF
25 Center have on your remarks or what you told the State Board of Canvassers in late

1 November?

2 A I was talking to the State Board of Canvassers expressing as a citizen my
3 concerns with the election. And, quite frankly, in public comments. And I believe as a
4 member of or a resident of the State of Michigan, and they allowed me to speak, and I
5 had the ability to share my concerns. Right or wrong.

6 Q I'm sorry?

7 A I said right or wrong, those were my thoughts.

8 Q Okay. And did those decisions about what had happened at the TCF Center
9 affect your remarks at all?

10 A No.

11 Q So after that, I understand Michigan State law has a recount procedure, a
12 recount provision that enabled the candidate to request a recount of the election in
13 Michigan.

14 Do you know whether President Trump ever sought a recount in Michigan?

15 A I don't. I don't recall.

16 Q Okay. So you don't know if he did or don't know if he didn't?

17 A I don't.

18 Q All right. Just before that State Board of Canvassers, I understand Speaker
19 Chatfield and Leader Shirkey went to D.C. and met with the President in the Oval Office.
20 Do you know anything about that visit by Speaker Chatfield or Leader Shirkey to
21 Washington?

22 A No, only what was reported in the news.

23 Q Did you ever talk to them after their visit to meet with the President about
24 that visit?

25 A I'm friends with both former Speaker Chatfield and Leader Shirkey. And I

1 talk to them often about all sorts of things. So it probably came up in a conversation of,
2 Wow, you got to go to the White House to the Oval Office, that kind of conversation.

3 Q Did they ever tell you what happened in their meeting with the President?

4 A I think it was more like just pretty crazy. I think there was six or seven
5 individuals that went, but not the specifics of the conversation. I -- you know, I
6 don't -- they didn't really tell me anything specific that I can recall.

7 Q Did they say whether the President raised issues -- let me start over. Did
8 Speaker Chatfield or Leader Shirkey say whether the President raised issues about the
9 election in Michigan during their visit?

10 A I don't know. I don't recall, and I don't think I specifically ever asked them
11 that or --

12 Q Did either of them say that the President had asked them to do anything
13 during that meeting they had with the President?

14 A To be quite honest, I don't recall. I mean we had a conversation about the
15 event but I don't know the specifics of what the meeting was about.

16 Q In that conversation, why don't you tell us what you do recall about the
17 event?

18 A Just that it was definitely quite historic for them to be in the Oval Office
19 where the President of the United States to talk about issues in Michigan. I don't know
20 what, specifically, they talked about. I believe, you know, and I didn't really push
21 about --

22 Q Anything else?

23 A I didn't really push to find out anything specifically about what the President
24 might or might not have said to them.

25 Q Do you remember them mentioning Rudy Giuliani's name in connection with

1 their meeting in Washington?

2 A I do not. I don't know who was in the meeting. I don't know. I didn't
3 ask, to be quite frank. Frankly I don't care.

4 Q Did you ever talk to either of them, Speaker Chatfield or Leader Shirkey
5 about whether the State legislature would take actions with respect to the election?

6 A As I told you before, I'm really good friends with them, so we would have
7 conversations. But if I ask them to do anything, the answer is no. I never asked them
8 to do anything.

9 I always wanted to be given a heads-up on what they were going to do if they
10 were going to do something, and that's why I would have weekly meetings, specifically,
11 with Speaker Chatfield just to figure out what the legislature was going to do that week, if
12 there was anything on their agenda that might be prickly for me in any way, and just to
13 kind of keep communications open since, you know, I was friends with them and had
14 been friends with them.

15 Q Did you have weekly meetings with Leader Shirkey as well?

16 A No, not really. He was always invited, but he never really -- we would just
17 kind of talk intermittently.

18 Q So, tell --

19 A He was in the House, I was in the House, so I had a much closer relationship
20 with the State house. But if there was something specific, Shirkey would call me. If
21 there was something an issue or something he was concerned about, he was a pretty
22 open communicator when it dealt with a party.

23 Q There was a lot of discussion around this time about whether the
24 legislatures, including the Michigan State legislature could take some action to appoint
25 Trump electors based on the outcome of the election. Do you remember that issue

1 coming up in Michigan?

2 A Yeah, I remember hearing about it, yes.

3 Q Tell us about your conversations, if any, with Speaker Chatfield about that
4 issue.

5 A I think he had been getting emails and requests the same as I had, and so we
6 just were talking about it. But it seemed from a legal perspective, the House was not
7 going to take any action to change the election results and --

8 Q Did he ever -- I am sorry. Go ahead. Sorry to interrupt you.

9 A And I'm pretty confident I might have had a conversation with Leader
10 Shirkey about that as well, and that they were not going to do something different than,
11 you know, their action which was to lead the election, the victory to Biden and Harris.

12 Q As certified by the State Board of Canvassers?

13 A Yes.

14 Q Okay. You said based on -- I don't want to put words in your mouth -- but
15 based on kind of legal conclusions or as a legal matter, was there a decision not to take
16 any action in State legislature to change the outcome of the election based on Michigan
17 State law, or was it a bigger issue, some other issue?

18 A I don't know what conversations the leaders had with their specifically legal
19 teams. I don't know on what legal advice they would be getting from their lawyers.

20 Q Did either --

21 A Which was very casual conversation.

22 Q Okay. Did either of them, Speaker Chatfield or Leader Shirkey tell you who
23 was asking them to take some legislative action to change the outcome?

24 A No, I mean, I think they probably got the same kinds of comments and
25 expectations from people across the State as I did.

1 Q Other than the meeting in Washington with the President, did they tell you
2 anything about their communications with the President, phone calls, for example?

3 A No.

4 Q What about outreach that they might have received from the campaign or
5 Mr. Giuliani about changing the outcome of the election, did they tell you about that?

6 A No.

7 Q No.

8 A I mean, I know that the mayor came to do a hearing, so there could have
9 been coordination with the House to have him come to the hearing, but that's just me
10 assuming again.

11 Q Okay. All right. If we can pull up these out of order, but exhibits 4 and 5,
12 starting with No. 5.

13 If you go down just a little bit, Grant. This is an email from Secretary Fourteenth
14 CD, copying a number of people, including a CC of Myra Rodriguez. And the subject is
15 Request for Review Draft Resolution of the Fourteenth Congressional District Republicans
16 Requesting Direct Appointment of Electors.

17 And then Terri Lynn Land sends that to you, Stu Sandler, and a second email
18 address for you asking if you had seen this. The first thing I'll ask you, who is Terry Lynn
19 Land?

20 A Terri Land was the chairman of the Third Congressional District and the
21 former Secretary of State for the State of Michigan.

22 Q Do you remember receiving this resolution requesting direct appointment of
23 electors from the 14th District?

24 A No. I mean, except from her, I guess. I mean, the evidence as I got it, but
25 I don't -- it doesn't ring clear in my mind.

1 Q Okay. And let's look at the actual resolution itself. It's exhibit No. 4.

2 A The draft resolution.

3 Q This is a draft resolution, although, I'll represent to you you've also provided
4 other versions of it that are dated.

5 A Okay.

6 Q So the first bullet point there essentially says that it's resolved by the 14th
7 Congressional District Republican Party to request that the legislature exercise its U.S.
8 constitutional powers and appoint a State of electors for President Trump.

9 Do you remember any discussions about this resolution or resolutions like it
10 coming out of the Michigan GOP?

11 A So this isn't a Michigan GOP document, let me make that really clear. This
12 is the 14th Congressional District. So there is 14 congressional districts across the State.
13 Those folks are elected in their congressional districts, the leadership.

14 They act. They're like their own little party. They're volunteers. They're
15 grassroots activists. They don't have any specific role. Some of them may be members
16 the State committee.

17 But they elect their leaders, they do resolutions, they can do -- they can do
18 anything they want. And they don't answer to the Michigan Republican Party, so to
19 speak.

20 Q Do you remember any discussions about resolutions like this? And thank
21 you for that clarification on the district versus the party.

22 A It's -- they're expressing their First Amendment right to resolve with a group
23 what they believe.

24 Q So when this came through, I mean, did you have discussions with anybody
25 about whether to support this or what to do with it from a GOP perspective, Michigan

1 GOP perspective?

2 A I don't support a resolution that a separate group is -- of volunteers is
3 resolving. I don't really have any role in that.

4 Q What's your understanding of why it came to you then? Why do you think
5 Stu and others, to your understanding, wanted you to see it?

6 A Just to let me know what was going on.

7 Q And what did you do as a result of that, if anything?

8 A I saw it, read it, and that's -- I didn't do anything. There is nothing for me to
9 do. I have no role in that resolution.

10 Q Do you know what, ultimately, happened with this resolution?

11 A I don't recall.

12 Q Did you present this resolution or any resolution like it to any members of
13 the state legislature?

14 A Did I?

15 Q Yeah.

16 A No. No.

17 Q All right. So you can take that down. Thank you.

18 On December 2nd, I understand that you participated in a Zoom call presentation
19 with Mr. Giuliani. Do you remember that?

20 A I do.

21 Q How did that come about?

22 A We had heard -- we being probably some staff or maybe it was read in the
23 paper -- that he was going to testify read in the State legislature hearing.

24 And so we reached out, we being the party reached out to see if he would do a
25 Zoom call for like a campaign update as the President's personal lawyer to grassroots

1 activists across the State via like a Facebook live.

2 Q Tell us about the conversations you've had with Mr. Giuliani before this,
3 setting it up or getting acquainted.

4 A I believe I had one brief conversation with him and I think his -- I don't know
5 if it was an assistant or co-worker or partner or lawyer -- somehow we tracked down a
6 name of a lawyer that he works with and got ahold of her -- and I apologize, I don't
7 remember her name -- on the phone and said, you know, we know he's coming to
8 Michigan.

9 Is there any way we could do an update with the grassroots activists in Michigan?
10 I know they would love to hear from the President's lawyer. And he agreed. It was
11 very brief. It was like she put it on speaker, and he was in the room, and then he left.
12 It was very brief.

13 Q I'm going to try to jog your memory and see if I can. Do you remember if
14 that person he was on the phone with Mr. Giuliani, was that Jenna Ellis?

15 A It wasn't Jenna. I would have remember that name because I followed her
16 on Twitter. It was somebody else. But I don't remember her name.

17 Q It could have been Katherine Friess?

18 A I'm sorry, I really don't. That doesn't sound familiar. But it could have
19 been. I don't know.

20 Q I'll give you another name, Christina Bobb. Does that sound familiar?

21 A I apologize. I just don't recall.

22 Q That's okay.

23 A I don't recall.

24 Q Yeah, that's okay. It's not a memory test. Just seeing if any of these
25 names jog your memory.

1 You mentioned this is intended to be a call with grassroots activists. What was
2 the purpose of the call? Was it to make a request to have them do something? What
3 was your understanding of why putting this on?

4 A I believe it was -- we called it an update, like a legal update from the
5 President's lawyer. From a political perspective, we had a lot of people feeling like they
6 weren't knowing what was going on, and we felt it was a great opportunity to let
7 volunteers across the State that had worked really hard to get Republicans elected, to
8 have a chance to hear directly from a source that they associate closely with the
9 President. And so that's why we had him.

10 Q After the call, did you talk to him about any next steps or any of his desires,
11 anything that would happen in Michigan with respect to the election?

12 A No.

13 Q Did you ever discuss voting machines with Mr. Giuliani?

14 A No.

15 Q And, specifically, do you remember him ever saying anything about the need
16 to seize or forensically examine voting machines in Michigan?

17 A I do not. I know we sent an email asking people to hold their evidence,
18 but -- potential evidence, I should say.

19 Q I do want to show you that, that's exhibit No. 14. While Grant's bringing
20 that up, how did this idea come about of asking clerks to hold their evidence. What was
21 the genesis of it?

22 A I don't recall. And to be quite frank, when I was asked to do it and, you
23 know, I think it came through somebody asked my -- somebody to ask me to do it. I
24 believe it came -- I can't remember where it came from, but somehow the request
25 funneled through to my staff. And I thought it was kind of silly because who's going to

1 listen or care what I say.

2 But, you know, it's kind of one of those things, you are like, oh, you can ask and if
3 people listen, cool, if they don't, they don't. I don't really have any authority to ask
4 them to do it. But sometimes, you know, people read it and say, oh, okay, well, maybe
5 we will hold onto this potential evidence.

6 Q You mentioned you didn't know where it came from. Did you ever ask
7 anybody on your staff where the --

8 A Yeah, I'm sure I asked. I just don't recall who it was from. It was very
9 non -- to me it was no big deal to ask somebody to do something. They don't have to
10 listen, and I recognize I had no authority to have them listen to me, but I asked. There is
11 no harm in asking.

12 Q Do you remember this request related to voting machines having anything to
13 do with Mr. Giuliani or his team?

14 A It might have, I don't recall.

15 Q What about the Trump campaign other than Mr. Giuliani, do you remember
16 having anything to do with like Mr. Flynn, John Flynn, who you mentioned earlier?

17 A I really don't want to speculate because I don't remember. It really was not
18 an eventful -- it wasn't that stark of an event for me. So I just, I'm sorry, I just don't
19 recall where it came from.

20 Q Do you know who you worked with on this request within the Michigan
21 GOP?

22 A I imagine it probably came through Mike Ambrosini. He usually
23 funnels -- everything kind of funnels up through him.

24 Q Do I have it right? He was the political director?

25 A No, he was the executive director.

1 Q Okay. Thank you. Apologies.

2 A That's okay. You would demote him. He would not like that.

3 Q Fair enough. I'll make a note not to do that. If you can go to exhibit no.
4 15, please. And just for clarity in the record we have been talking about this request to
5 the clerks to preserve information related to voting machines. Is this the request that
6 you were talking about here at exhibit 15?

7 A Yes.

8 Q Do you know if anything came from this request? Did people do any
9 forensic analysis that you're aware of the data that had been preserved or requested to
10 be preserved?

11 A I'm not aware.

12 Q Do you know anything about Mr. Giuliani or members of his legal team
13 meeting with plaintiffs in the lawsuit in Antrim County about voting machines,
14 specifically, Bill Bailey or Bill Bailey's legal team?

15 A I do not.

16 Q Are you aware of anybody including Mr. Giuliani or people on his legal team
17 going to Michigan to inspect voting machines?

18 A I'm not aware of that.

19 Q Are you aware of any outreach that Mr. Giuliani and his legal team or the
20 Trump campaign made to local prosecutors in Michigan to get access to voting machines?

21 A I'm not aware of that.

22 Q Okay. And it's been publicly reported that Antrim County prosecutor James
23 Rossiter received a phone call from Mr. Giuliani asking for access to voting machines.
24 Are you aware of that at all?

25 A I don't recall that.

1 Q Okay. You can take that down. Thank you.

2 All right. So we talked a little bit about efforts to have the legislature -- the idea
3 that the legislature in Michigan to appoint Trump electors. But are you familiar with a
4 separate effort to have Trump electors cast votes in Michigan even without some State
5 legislative action?

6 A Am I aware of that occurring?

7 Q Correct.

8 A Yes.

9 Q And what was your role, if any, with respect to that effort to have Trump
10 electors cast votes in Michigan?

11 A I had no role in that.

12 Q Did you speak to Mr. Giuliani at all about having Trump electors meet and
13 cast votes in Michigan?

14 A No.

15 Q Did you speak to anybody from the campaign, including Mr. Flynn, or others
16 about this effort?

17 A I think we had a call right before. There was a lot of back and forth. Just
18 so you know, I got COVID from Mr. Giuliani, and so --

19 Q Sorry to hear that.

20 A Yeah. So I was in quarantine when the electors were supposed to meet in
21 Michigan.

22 Q Okay. We'll just walk through some of this. But what do you remember
23 of your conversations with Mr. Flynn some of the back and forth that you said about this
24 issue?

25 A I think it was just the they, they being the campaign, had requested the party

1 to help facilitate a meeting of the electors. There was this Bob Norton from Hillsdale
2 who had called me. I don't think he had an official role, but he is out of Hillsdale. And
3 they were asking me to facilitate having the electors meet and sign some sort of
4 document.

5 And I was very uncomfortable with that as per my lawyers' opinion as well, like
6 confirm that we felt that that was something that was not appropriate.

7 So we came up with a document that we would have them have a ceremonial
8 meeting, and one person would sign a document stating that if perhaps something were
9 to happen in the courts, they were willing and able to serve as electors from Michigan for
10 Donald Trump and Mike Pence.

11 Q We'll go through some of that. I want to start with Mr. Norton. Are you
12 talking about Mr. Norton from Hillsdale being Hillsdale College?

13 A Yes. Yeah, I don't know where he lives. I don't know where he lives.
14 Hillsdale College, yes.

15 Q Okay. Did you know Mr. Norton before he called you?

16 A Yes, just, you know, here and there, yeah.

17 Q And what do you remember him saying to you, specifically, about this issue
18 of having the electors meet?

19 A He told me that the Michigan Republican electors were planning to meet in
20 the capital and hide overnight so that they could fulfill the role of casting their vote in per
21 law in the Michigan chambers.

22 And I told him in no uncertain terms that that was insane and inappropriate, and
23 the capital was locked down because of some police issue. I'm not really sure of the
24 details.

25 And so these people were going to in violation of the lockdown sneak in and stay

1 overnight and then allegedly kind of cast their vote in the Michigan capital.

2 Q Okay. So when you say hide overnight, you mean what you just said,
3 they'd sneak into the capital on the 13th, hide there so they could vote on the 14th?

4 A That's what he told me, yes. And I in no uncertain terms told him that that
5 was a very, very bad idea and potentially illegal.

6 Q What was his response?

7 A He was -- didn't care about my opinion. Just we had words, and I believe I
8 eventually hung up on him. And I called Mike Shirkey, Leader Shirkey to say that -- to
9 tell him of the information that I had heard which was that these -- these electors, who
10 some of them are older were planning to stay the night in a senator's office -- an
11 unnamed senator.

12 I didn't know what senator's name office in the capital. And he agreed with me
13 that that was a very, very bad idea, and he was going to talk to his members to make sure
14 that nobody was planning to facilitate that idea.

15 Q Did Mr. Norton say who he was working with at all on this effort to have
16 electors meet?

17 A He said he was working with the President's campaign. But he did not
18 name individuals.

19 Q And were you aware of any effort to actually get into the capital by these
20 electors on the 13th to hide overnight?

21 A I was not there. And I believe that idea got shut down. And there's
22 probably a million cameras, so I don't believe that the State police would even have
23 allowed it to happen. So I don't know if there was any attempt. I think they kind of
24 canned that idea. I think cooler heads prevailed.

25 Q You said that you're uncomfortable now a couple times with this and

1 thought it was inappropriate. Why is that? If you could explain that a little bit more.

2 A Well, one, I think it was just, it was a hair-brained idea, and the more details
3 I got, it became more hair-brained.

4 Q What additional details did you get other than them hiding in the capital?

5 A I mean, well, I guess they were going to sign a document, and that document
6 was like an affidavit stating that they were voting for the President and that was
7 not -- they weren't doing that.

8 If something happened in the courts, and they were able or called upon to be able
9 to cast their vote, their electoral votes, then I think what we compromised and was able
10 to come up with was this document stating that they would do that, if asked, I think
11 would cover the bases that the -- if that possibly happened.

12 Q Okay. So what was your understanding then? It sounds like that
13 these -- you thought that this, these votes would be contingent on some outcome in a
14 court case. Is that right?

15 A I mean, that's -- if something got overturned -- this was an if something
16 happens at a later date past the date of the electors casting their vote.

17 Q Did Mr. Norton from Hillsdale College say anything about these votes being
18 contingent on an event like that?

19 A No, I don't -- I don't believe so.

20 Q Did he say why he wanted these votes?

21 A Well, I mean, he wanted the electoral votes cast for the President.

22 Q Did he say anything about sending them to the Congress or the Vice
23 President?

24 A He didn't talk about steps after that with me.

25 Q Did you ever hear from Senator Shirkey after you talked with him about this

1 idea that people had tried to get into Senate offices and stay there perhaps?

2 A I think the senator called me after I had called him just to say, you know,
3 that's -- that will not be happening. I'm on it. Like I think we might have had a
4 follow-up call.

5 Q Okay. And your call to Senator Shirkey, was it the same day as your call
6 with Mr. Norton?

7 A Probably.

8 Q Do you remember roughly when your call with Mr. Norton was?

9 A I don't. I apologize.

10 Q Okay. I want to show you a few documents. If we can go to exhibit
11 No. 17, please.

12 This is an email from Mr. Ambrosini to you with electors contact, and there's
13 spreadsheet, which is exhibit no. 16. He sent that to you on Friday, December the 11th,
14 and it has a number of people listed along with their contact information who are the
15 Republican electors in Michigan. Do you remember receiving this from Mr. Ambrosini?

16 A Yes.

17 Q Tell me about this.

18 A It's the list of named electors that were elected by each congressional
19 district, and then there were two at large that the State committee elected as the
20 Michigan electors for the Republican Party.

21 Q Do you remember if this came in to you before or after your call with Mr.
22 Norton from Hillsdale College?

23 A I don't recall.

24 Q Okay. Were you expecting this from Mr. Ambrosini?

25 A I'm sure I asked for it.

1 Q Do you remember why you asked for it? Was it in response to this coming
2 up, this issue coming up about alternate electors voting?

3 A I think it came up just -- yeah, because the date was coming up, and we were
4 talking about -- I mean, there was some talk about facilitating what ended up to be a
5 ceremonial meeting, and we facilitated that at the headquarters.

6 Q If you go to exhibit No. 18, please. And we're going to talk about that
7 meeting in just a moment. But just a couple minutes after Mr. Ambrosini sent you to
8 contact list, he also sends you electors' paperwork from 2016. Do you know why he
9 sent you this? Was it something you requested?

10 A I'm sure I did.

11 Q Do you remember why you requested it?

12 A I think because I had had some conversations, and I had gotten this affidavit,
13 and I wanted to look at that compared to what they had presented to me.

14 Q Do you remember whether at this point on Friday, the 11th, when you're
15 getting this information from Mr. Ambrosini, you had decided that this was an idea that
16 should not go forward?

17 A As presented by Mr. Norton, yes, that should not go forward, yes.

18 Q And you had determined it by this time?

19 A I'm pretty sure I -- I don't remember the timeline. I mean, I -- what we
20 ended up getting to I think was a good plan, but the timeline, I'm sorry I don't recall. I
21 was stuck in my room, so I literally, those days are -- you know, literally I was in my room
22 the entire time. So the days run into each other.

23 Q Okay. I completely understand that. Was the call from Mr. Norton
24 directly to you, or was there other people on the call?

25 A I think it was just him to me.

1 Q Were you expecting a call from him?

2 A No, no.

3 Q You mentioned the meeting that took place at GOP headquarters. Do you
4 view that as something different than Mr. Norton had presented as far as -- you know,
5 you said Mr. Norton's idea was hair-brained, it shouldn't go forward. What about the
6 meeting at the GOP headquarters?

7 A The meeting at the GOP headquarters -- and I want to preface this with or to
8 set the mood or tone -- this was a very, a highly contagious time with COVID. I had a lot
9 of young parents, young family members, you know, with young children. And we didn't
10 know how contagious it was. I had some people out intermittently. So we had very
11 few people at the headquarters to facilitate the ceremony. And we did not let any extra
12 people in the building at all.

13 That was of most concern just to keep the people that had kind of pulled the short
14 straw to have to be there to potentially expose themselves to, you know, the virus.

15 So, you know, that's kind of how, you know, how we proceeded. So it was just
16 going to be just the electors could be in the building. And that was met with some
17 resistance by some of the electors.

18 Q Why?

19 A Well, specifically, Mashawn Maddock wanted to bring her husband and a
20 camera crew in. Under no circumstances were we going to allow a camera crew in to
21 film the ceremony because it was just a ceremony, and we believed that that was not
22 appropriate. And we wanted to control the meeting and the contents of the meeting.

23 Q Do you think it was important not -- or for the ceremony not to get out
24 publicly?

25 A It was just a ceremony, and I didn't want it to be misconstrued as something

1 as other than a ceremony. So that was important.

2 Q And you thought that could happen if it did get out, if there is a release of
3 footage showing this meeting? You thought it might get misconstrued?

4 A I did believe that that was potentially an issue.

5 Q How did you think it would get misconstrued?

6 A I don't know. I'm just trying to troubleshoot so that it didn't get
7 misconstrued. I wasn't there to be able to control the meeting myself, and so I made
8 some strict rules to make sure that we did everything possible to not allow any
9 misconstruement, or however you would say it of the information. I'm sure that was
10 the wrong word.

11 Q Okay. Did you think it could get misconstrued as an effort to have Trump
12 win the State of Michigan when he had actually been declared the loser in Michigan?

13 A I believe that that was a potential.

14 Q Now, I'm going to show you exhibit No. 19.

15 Ms. Cox, before we get started on this, we have been going for about an hour and
16 45 minutes or so. If you need to take a break at any point, just let us know. We're
17 happy to?

18 A Yeah, can I just, yeah, do a little quick restroom break? That would be
19 good.

20 Q Yes, of course. Let's go off the record --

21 A I am going to mute and then do the mute and video, stop video?

22 Q Just one moment. Let's go off the record.

23 [Recess.]

1

2

[12:07 p.m.]

3

BY MR.

4

Q All right. Let's go back on the record. It's 12:07, and we are resuming the

5

deposition of Ms. Laura Cox. If we could go to exhibit No. 19, please.

6

All right. Exhibit No. 19 looks to be a calendar entry. And I'm sorry, if we can

7

go to 20, actually. Okay. So exhibit 20 is a calendar entry for Saturday, December the

8

12th, which about two days before the electoral college met to cast votes. This is

9

for -- it looks like a 6:30 call with, you, Ms. Cox, Mike Ambrosini, Mr. Flynn from the

10

campaign, and Mr. Roman from the campaign sent to you by Mr. John Black. Did you

11

participate in this call on Saturday, December 12th?

12

A I think I did, yes.

13

Q Okay. And using this as a guidepost, was this before or after the call you

14

had with Mr. Norton from Hillsdale College?

15

A It must have been after, but I can't remember the timeline.

16

Q Now, tell us about this call. What do you remember happening on this

17

call?

18

A I kind of don't remember the specifics of this, but I do want to just correct or

19

clarify the record just to let you know that, you know, you talk about the -- I just want to

20

make sure that it's really clear that the Bob Norton idea and issue in meetings and

21

whatever they had concocted to do was very separate from what I -- my plan and what

22

was to happen which was the meeting at our headquarters that was a ceremony. And I

23

have a totally different document than the affidavit that you all may be referring to.

24

And, you know, I just want you to know that I prepared a document and set up

25

and prepared for a ceremony, and it's totally different than what, obviously, has been

1 reported in the press of what happened.

2 Q Okay.

3 A So I just wanted to make sure that -- they are very separate things. Two
4 separate things.

5 Q Okay. Understood. Separate plans. And I do want to get into those.
6 Tell us about this call, and then we'll move on to things that actually happened that had
7 been planned for December the 14th.

8 A I just think this was a call to facilitate using the headquarters for the
9 ceremony.

10 Q Okay.

11 A Everybody thought of it as a ceremony at the time, but I don't remember the
12 timeline.

13 Q Well, other than a ceremony, how would people be thinking of it, as you
14 recall?

15 A Well, I know that there was an affidavit that was totally different, and I was
16 not going to facilitate that kind of a meeting. I was facilitating a ceremony.

17 Q What do you recall of the affidavit? You have now mentioned that a
18 couple of times. What was the affidavit, if you remember?

19 A Well, it was -- what was reported -- reported that was used that, you know,
20 has been in the press that is more of them signing an affidavit as an electoral would.

21 Q And you had concerns about that as opposed to the ceremony that you
22 proposed. Is that right?

23 A Yes, yes.

24 Q And what were your concerns with those documents that the electors signed
25 and reported in the press, you're referring to as an affidavit?

1 Mr. Warrington. [REDACTED] I just want to be clear, she found out about those other
2 documents after the event. She didn't prepare the documents that are reported as
3 electors certificates. She didn't prepare that. She didn't have any prior knowledge of
4 that.

5 Mr. [REDACTED] That's okay.

6 Mr. Warrington. I just wanted to make sure that that's clear. She found out
7 about that later. And I don't think that -- with the question and answer, I don't think
8 that came out as clear as it should be?

9 BY MR [REDACTED]

10 Q Understood. Got it, Mr. Warrington.

11 So you heard it -- is it right that you -- well, maybe we can show you the
12 documents. Give us a second to pull that up. Just bare with us a moment.

13 Well while that's coming up, this call that you had, on the call were Mike Roman
14 and others. Do you know who Mike Roman is?

15 A I think he worked for the campaign, but or he was the RNC person. I can't
16 remember. I think I have met him a couple of times.

17 Q Do you remember what his role was with respect to this alternate elector
18 plan?

19 A No, I don't recall his role.

20 Q Do you remember him saying anything in the call on December 12th at 6:30?

21 A No, I don't.

22 Q Okay. You mentioned that this -- this call -- I just want to go back to it.
23 Just a second on that.

24 I'm sorry, because now I am kind of mentally mixed up between all the different
25 things that we're talking about. So I'm trying to get the timeline right as Mr. Warrington

1 referred to.

2 A Right.

3 Q In this call, what was your understanding, or what is your recall of this
4 specific discussion that happened on December 12th?

5 A I can't remember. I can't remember the specific timeline of what they may
6 have been proposing in broad terms to have the electors meet. I don't recall the call, to
7 be quite honest, because there was a flurry of activity regarding this issue. And I was
8 really concerned about not being a part of something that I felt was wrong.

9 Q Okay. Can you explain that a little bit more? Like your concerns and
10 being wrong. We talked about your concerns with Mr. Norton's proposal. Now, we're
11 on a separate plan to have electors meet and cast votes.

12 A Just that they weren't going to -- they were elected as electors but, you
13 know, they -- they were elected as electors, but they weren't going to be able to perform
14 their duties based on the results of the election.

15 Q And is that why some of the reasons you talked about earlier for preventing
16 camera crews or publicity around this meeting on the 14th?

17 A Yes. When I was proposed the idea that people were going to hide in the
18 State capital, that alerted to me that it could be possibly chaotic, at best.

19 Q What do you mean by chaotic?

20 A I mean, people are going to hide in the State capital to do something that
21 really -- that put it at a level that was concerning to me. I mean, there is really no other
22 way to put it.

23 Q I guess I am just trying to better understand that concerning in like there
24 could be violence which could lead to a bad outcome. What were your concerns?

25 A I just felt like it could lead to a bad outcome.

1 [12:15 p.m.]

2 BY MR. [REDACTED]

3 Q Bad in what way though?

4 A Bad that it was inappropriate at best.

5 Q Okay. I guess in the scale of things that are bad, you know, you could say
6 on one hand this is bad because it creates a bad political situation for Speaker Shirkey or
7 Leader Chatfield, two of your friends, and then there's bad that, like, this could lead in
8 violence, because people are trespassing and, I don't know, any host of things could
9 happen. So can you just tell us where on that spectrum or on any spectrum of bad
10 you're talking about?

11 A I just -- I don't -- I didn't think it would lead to violence. That was never any
12 concern. It was just inappropriate, and, you know, maybe violated possibly some rules
13 or laws. I didn't know. I didn't know what I didn't know. It just, in my gut, didn't
14 seem like a good idea. It doesn't mean some folks didn't have the best intentions, it's
15 just I didn't know that it was a good idea.

16 Q Okay. In this call, going back to the call on the 12th with the folks on the
17 campaign, do you remember them expressing -- meaning the Trump campaign or
18 representatives from the campaign -- expressing the purpose of having electors meet and
19 cast votes for Trump in Michigan?

20 A I believe it was referring to some incident that happened years ago in Hawaii
21 that they were referring to that. I don't know the specifics, but I think, in my mind, it
22 was if something happened and the election were overturned, and they were asked to
23 cast their votes, they would cast their votes for the President and Mike Pence.

24 Q Okay.

25 A But -- but this -- what I wanted to do was a ceremonial thing that made it

1 clear if they were asked, but they weren't doing that. They weren't casting a vote, in air
2 quotes.

3 Q And we understand, along the lines of what you mentioned earlier, that you
4 instructed GOP staff to make sure that camera crews and others didn't record this event.
5 Is that right?

6 A Yes. I wanted to make sure that that didn't happen. We wanted to
7 prevent it. I mean, this was like a -- allegedly, I wasn't there, but it was reported to me
8 by some people in the staff that this was a guy with a real big, like, a camera.

9 Q Did you instruct anybody on your staff to do that? Or I guess, let me
10 rephrase that. Who did you instruct on the GOP staff to make sure that this camera or
11 other cameras didn't get in?

12 A I think there were three or four people that were present, and those were
13 the folks that I instructed.

14 Q Who were the three or four people that you recall being present?

15 A I believe it was Henrietta Tow, because she was in -- she was there; Tony
16 Zammit, because he had had COVID, so I had him there because he had had it; and Troy
17 Hudson.

18 Q Did you --

19 A And I don't -- I don't recall if Mike -- Mike Ambrosini was or was not there.
20 I don't remember.

21 Q Do you know who from the Trump campaign was there on December 14th?

22 A Shawn Flynn, I believe.

23 Q Anybody else?

24 A I don't know. I wasn't there.

25 Q Do you remember who was responsible for bringing the paperwork that the

1 electors, alternate electors signed?

2 A I wasn't there. I don't know.

3 Q Did you --

4 A We had a -- we had a ceremonial document.

5 Q Okay. We're about to get to that. Did you participate at all? Did they
6 call you during any piece of this, FaceTime you?

7 A I don't recall. I think they -- I had calls that people were trying to come in,
8 and I reassured them that they are not to let anybody else in, and I think they called me
9 after to say it was done.

10 Q Okay. If you could go to exhibit No. 23, please. And, Ms. Cox, this is a
11 document that you provided to us. You sent it on Saturday, December 12th, looks
12 like at -- well, this is UTC time, so around the time of that call. This would be about
13 2 hours actually before the call that we had just looked at on Saturday evening. This is
14 to Troy Hudson with Michigan electors affidavit.

15 And then if you go to exhibit 23 -- I'm sorry, 22, apologies.

16 A Yeah, this is -- this is not my document, yes. This is the one that
17 they -- they must have, the campaign, somebody must have gave that to me and I sent it
18 to Troy to say like what -- why, you know, this is crazy.

19 Q All right. So let me show you something else, then we'll come back to this
20 then. If you could put up, and we'll call it exhibit No. 31. These are the documents
21 that the Michigan -- I'm representing this to you -- that the Michigan electors, alternate
22 electors signed for President Trump and sent in to Congress, the National Archives, and
23 the Vice President.

24 And if you go down to page two of this, it says, "We, the undersigned, being the
25 duly elected and qualified electors for President and Vice President of the United States

1 of America from the State of Michigan, do hereby certify the following, we convened at
2 the State Capitol, that we proceeded to vote by ballot and cast votes for Mr. Trump and
3 Mr. Pence." And then it's signed by all of these electors.

4 So earlier you mentioned documents that had been -- have come out in the press
5 since then that you hadn't seen before. Are these -- is this the affidavit or the
6 documents that you're talking about that were reported in the press that you hadn't seen
7 before?

8 A I did not see this. This is not the document that I provided to -- for my
9 ceremony.

10 Q Okay. Let's go back to exhibit 22. This one you did provide to us. It was
11 attached to that email we just looked at. And it goes through a few things. And
12 number two, it says, I have been a citizen and resident or registered elector of the
13 congressional district in which I am designated a presidential elector. It goes through a
14 few others.

15 And then number 5, "I am available to meet and perform my duties as a
16 presidential elector required by the U.S. Constitution, Michigan's State Constitution, and
17 Michigan's election code 168.47 in that I am available to, quote, 'convene in the Senate
18 chamber at the Capitol on 2:00 p.m. Eastern Standard Time on the first Monday after the
19 second Wednesday in December following the November 3rd general election,' as
20 required by MCL 168.47."

21 And then it says, as required by "Michigan's faithful electors provision," in that
22 same statute, "I will convene and cast my vote for Donald J. Trump as President of the
23 United States and Michael R. Pence as Vice President of the United States."

24 So is this the ceremonial document that you were talking about where people said
25 they would be available to do this?

1 A I need to take a moment to look at this document a little further, because I
2 have a different document.

3 Q Okay. Take your time.

4 A So can I take a break, please, and then I'll get back with you on that?
5 Because I have a different document.

6 Q Yes, of course. Let's go off the record. Take as much time as you need.

7 A All right. Thank you.

8 [Discussion off the record.]

9 Mr. [REDACTED]. Okay. All right. Let's go back on the record. It's 12:34 p.m.,
10 and we're resuming the deposition of Ms. Laura Cox.

11 BY MR. [REDACTED]

12 Q So we left off trying to piece together the, I guess, the arc or trajectory of
13 this plan to have alternate electors meet and cast votes for President Trump. And we
14 were looking at exhibit No. 22 and new exhibit No. 31. But why don't you tell us what
15 you recall of -- aside from the Mr. Northon plan, what you recall of the effort to have the
16 alternate electors meet and cast votes for Mr. Trump?

17 A Well, that -- are you referring to that document?

18 Q Yeah. I guess --

19 A I think I've told you pretty much everything, that they wanted to meet, they
20 were going to do the -- inside the Capitol. I think I kind of told you that already.

21 Q Okay. So -- but you mentioned that your understanding was that the
22 electors would be meeting in a ceremony and signing a certain document. So tell us
23 about your expectations for that ceremony and what this document that you thought
24 they would be signing was?

25 A It was a ceremonial document that was signed by one individual, Kathy

1 Berden, and it was stating that basically they were designated to be the electors.

2 Do you want me to read it, David, or no?

3 Mr. Warrington. Yeah. Let's -- if you -- and, [REDACTED] we can provide this to you
4 without waiving the privilege of the communication involved between the lawyer and our
5 client. The attachment, itself, we can provide to you.

6 Mr. [REDACTED] Okay. That sounds great.

7 Mr. Warrington. Okay. So I'll let her read the document that was the
8 ceremonial document that she's referred to.

9 BY MR. [REDACTED]

10 Q Okay. So I understand we're going to get it, but why don't you read it now,
11 Ms. Cox.

12 A All right. So at the top it says, State of Michigan declaration to the Senate
13 and House of Representatives. Then there's a subtitle, or a title, recognition of
14 presidential electors designated for Donald J. Trump and Michael R. Pence.

15 Then it says, "Whereas the 16 presidential electors for Donald J. Trump and
16 Michael R. Pence were properly designated by the Michigan Republican Party, there was
17 a meeting on December 14, 2020, by those electors to recognize and affirm their support
18 for Donald J. Trump and Michael R. Pence. All have affirmed they are available to meet
19 and perform their duties as a presidential elector required by the United States
20 Constitution, Michigan's State Constitution, and Michigan's election code 168.47.

21 "All have affirmed that, as required by Michigan's faithful electors provision in
22 MCL 168.47, they would cast their votes for Donald J. Trump as President of the United
23 States and Michael R. Pence as Vice President of the United States. These presidential
24 electors are honored and affirmed by today's ceremony."

25 "Signed," and then there's a line, and Kathy Berden, Michigan Republican National

1 Committeewoman.

2 Then it says -- then there's a place for it to be notarized at the bottom.

3 Q And was that document notarized?

4 A I assume it was. I wasn't there.

5 Q Okay. So your understanding, and I don't want to put words in your
6 mouth, Ms. Cox, but your understanding is that the meeting on December 14th of the
7 Republican electors at GOP headquarters was to gather and sign or attest to that
8 document, right?

9 A Yes.

10 Q Okay. Was it your understanding they would be doing anything else?

11 A No.

12 Q Did Ms. Berden sign that document?

13 A I believe she did, yes.

14 Q Was there --

15 A I wasn't there.

16 Q Okay.

17 A I wasn't there.

18 Q What makes you think she did sign it? Did she tell you?

19 A I don't think I had a conversation about it. I was not there.

20 Q Okay. Was -- and maybe I'll see it when I get to look at it, but was there
21 room for the other electors to sign as well, or is it just Ms. Berden as like the chair of the
22 electors?

23 A It was just Ms. Berden.

24 Q Okay. Why her?

25 A I think because she was the national committeewoman.

1 Q Now, going back to exhibit No. 22, which is the affidavit that was attached to
2 an email you sent to Mr. Hudson, do you remember why you sent this affidavit to
3 Mr. Hudson?

4 A It was one of the early drafts before we kind of came to a decision on how
5 we were going to move forward.

6 Q Early drafts of the document that you just read into the record. Is that
7 right?

8 A Yes. This was a totally different document than what I read into the record.

9 Q Okay. And if we could pull up new exhibit No. 31. These, again, are the
10 votes. And if you go down, Grant, we're looking at page two. Going to page three, we
11 have signatures of Ms. Berden, Ms. Rodriguez, Ms. Maddock, Mr. Haggard,
12 Mr. Vanderwood, and other Republican electors.

13 Is it right that you were not aware that the Republican electors in Michigan were
14 going to sign this document when they met on December 14th?

15 A I did not know they were going to sign a document.

16 Q Have you ever seen this document blank, in draft form or otherwise, before
17 it was reported in the press --

18 A I don't believe I --

19 Q -- to the best of your recollection. Sorry.

20 A I don't believe I have.

21 Q Okay. Now, it sounds like in the language, if I recall correctly from the
22 document that you read, it's effectively saying, If a court decides something, or if the
23 outcome of the election changes, we're ready to do our job as electors; whereas this
24 document says, We are electors and we're casting votes. Is that an important
25 distinction for you as you're going through this process in hearing about what might

1 happen on December 14th?

2 A Yes.

3 Q Explain why.

4 A Because I wanted a ceremony. That was what I was more comfortable
5 with.

6 Q After the electors met, some of them walked to the State Capitol in Lansing
7 from GOP headquarters. Were you aware of that, that they were going to be walking to
8 the Capitol?

9 A As reported by the news, I was.

10 Q Okay. So you only found out afterwards?

11 A Yes.

12 Q There was somebody named Ian Northon who was with them at the Capitol
13 in Lansing. Do you know who Ian Northon is?

14 A I do not.

15 Q Do you ever remember hearing about Mr. Northon and his role with respect
16 to the alternate Republican electors?

17 A I do not.

18 Q Did you speak to any of the Republican electors after they met and cast
19 votes for Donald Trump on the 14th about what had happened?

20 A I don't -- I don't believe so.

21 Q Did you ever talk to Ms. Berden about her experience that day on the 14th
22 casting votes for Mr. Trump? And that includes up until today.

23 A Well, she was the ceremonial form, but I don't -- I don't believe I -- I was not
24 aware of the -- this -- that document you just showed me.

25 Q Even if you weren't aware of that document specifically, were you aware, or

1 did you ever learn from any of the electors or people who were there, including
2 Mr. Zammit or otherwise, that they signed documents other than just that ceremonial
3 affidavit you read?

4 A I was not aware.

5 Q Did you talk to anybody -- or excuse me, let me rephrase that.

6 Did you speak with any of the people who acted as an alternate elector,
7 Ms. Berden, Ms. Maddock, Ms. Rodriguez, or otherwise about any concerns they had in
8 casting votes for Mr. Trump?

9 A I don't -- I don't recall.

10 Q Okay. It sounds like you had concerns about certain aspects other than this
11 ceremonial document that you helped prepare. Did anybody else have any concerns
12 that you recall?

13 A I don't -- I don't recall.

14 Q If we could pull up exhibit No. 29. Do you -- and by the way, on that
15 Saturday phone call, from Saturday the 12th, do you remember if Mr. Giuliani
16 participated?

17 A I don't recall. I think I would remember that, and I don't -- I don't think he
18 did.

19 Q Okay. So exhibit No. 29 is a memo sent by a man named Ken Chesebro to
20 another man named James Troupis. And this memo -- if you zoom out just a bit,
21 Grant -- it talks about the statutory requirements for December 14th electoral votes, and
22 it goes through various Federal law requirements and State law requirements.

23 And if you go down, keep going, specifically page 4, it talks about various statutory
24 provisions in Michigan, about the meeting of electors, including the fact that they shall
25 convene in the Senate Chamber of the Capitol at 2:00 p.m.

1 Have you ever seen this document before?

2 A I don't remember.

3 Q All right. Do you know -- did you ever remember hearing about the name
4 Ken, or Kenneth Chesebro, or Chesebro?

5 A I -- I -- I don't remember. Sorry.

6 Q No, that's okay. Just asking what you remember.

7 I understand that this document was sent to various groups of electors around the
8 country in several States. Do you remember receiving any documents about
9 requirements or the legal basis for having electors meet in Michigan and cast votes for
10 Mr. Trump?

11 A I don't recall any specific documents. A lot of people sent me a lot of
12 things, so --

13 Q Okay. You can take that down.

14 Okay. So one of the people who was a Republican elector for Mr. Trump in
15 Michigan was Meshawn Maddock. Do you know who that is?

16 A I do.

17 Q I believe you -- you mentioned earlier that her husband wanted to come into
18 the meeting of the electors on December 14th. Is that right?

19 A That's correct.

20 Q What was her role, if any, in organizing or setting up this meeting of the
21 electors?

22 A I'm not aware of what her role is, and I don't want to speculate, but I believe
23 that she -- I assume that she was part of some of these cockemamie plans. And I --

24 Q Why is that?

25 A On the video, you see her trying to get into the Capitol that was recorded,

1 widely recorded.

2 Q Do you know if she had any -- or was she in communication with people
3 from the Trump campaign about these plans?

4 A I -- I don't know that for a fact, but I assume she was.

5 Q Okay. And separate from these plans specifically to have Trump electors
6 meet in Michigan, do you know if she was in touch with individuals in the Trump
7 campaign?

8 A I know she know -- knew people from the campaign. She was on the
9 Women for Trump board of directors, but I don't know who -- I don't want to speculate
10 on who she knows or who she talks to.

11 Q Did you ever talk with her about any efforts that she proposed, or that
12 should happen with respect to the 2020 election?

13 A No.

14 Q It's been reported that she helped organize a group of buses to go to
15 Washington, D.C. from Michigan for January the 6th. Do you know anything about her
16 organizing groups of buses to go to Washington?

17 A I only know what has been recorded. I don't -- I don't have any evidence,
18 so I don't want to speculate.

19 Q Did you ever talk to anybody who went on those buses that Ms. Maddock
20 helped arrange to Washington for the 6th?

21 A No, I haven't.

22 Q Okay. If we go to exhibit No. 25, please. All right. This is an email that
23 looks like you were blind copied on from Ms. Shirlene Ostrov from the GOP party in
24 Hawaii. This is something that you produced to us. Do you recall receiving this email
25 from Ms. Ostrov?

1 A I do not.

2 Q Do you know who Ms. Ostrov is?

3 A I do.

4 Q Who is that?

5 A She's the chair of -- I don't know if she currently is, but she was the chair of
6 the Hawaiian Republican Party, or Hawaii -- the Republican Party in Hawaii.

7 Q Do you know anything about her asking the Vice President to delay the
8 certification of Biden as the winner in the joint session on January the 6th?

9 A I do not.

10 Q She attached a letter to this that she sent to Chairwoman McDaniel, and
11 that's at exhibit No. 24. Do you recall doing anything with the letter that she sent to you
12 or copied you on intended for the Vice President?

13 A I was blind copied, and I didn't do anything with it.

14 Q Do you remember talking with Ms. McDaniel about this letter?

15 A I do not.

16 Q Were you ever asked to write a letter on behalf of the party in Michigan, or
17 sign on to a letter in Michigan asking the Vice President to do anything with respect to the
18 joint session other than that just count votes on January 6th?

19 A No.

20 Q Did you send any letters to Congress or the Vice President or the President
21 of the United States related to January the 6th?

22 A I did not.

23 Q Going back briefly to the electors issue, do you remember hearing from
24 anybody who was there on December 14th that Ms. Maddock was insistent on getting a
25 picture taken of the group at the GOP headquarters?

1 A I did not hear about that. I wasn't there.

2 Q Do you know who Representative Daire Rendon is?

3 A I do. I served with her --

4 Q Do you know -- I'm sorry, go ahead.

5 A I served in the State House with her, yes.

6 Q Do you remember whether she was with Ms. Maddock that day?

7 A I saw her in the news clips.

8 Q Did you ever talk to her about what happened at GOP headquarters in

9 casting votes for Trump on December 14th?

10 A I don't recall doing that.

11 Q I believe Representative Rendon may have been trying to get in actually with
12 Mr. Maddock and the news crew. Do you remember hearing anything about that other
13 than what you saw publicly reported?

14 A I was not there, so I only know what was reported.

15 Q Okay. Do you know whether Terri Lynn Land actually participated as an
16 alternate elector on December 14th in Michigan?

17 A I believe she did not come to the ceremony.

18 Q Do you know why?

19 A You'd have to ask Terri. I don't know.

20 Q Did she ever tell you why she didn't show up for that?

21 A She said she wasn't comfortable with it.

22 Q Did she elaborate to you on that?

23 A No. She was a former Secretary of State. I believe she's -- has her own
24 beliefs, and she wasn't comfortable doing it.

25 Q And was it your understanding that she was uncomfortable because she

1 would effectively be casting a vote for Mr. Trump, or was it for some other reason?

2 A I really don't want to speculate as to why she didn't want to come.

3 Q Okay. I'm not asking you to speculate, just what she told you. Did she tell
4 you that, give a reason for why she's uncomfortable?

5 A I think she just said she was uncomfortable with the whole thing.

6 Q Did she say anything else?

7 A Not that I recall.

8 Q When did this happen, before December 14th or after?

9 A I think I talked to her before.

10 Q And she just said I'm uncomfortable, and what did you say to her?

11 A I can't remember specifically everything that was said. It was -- I remember
12 it was brief, and I just explained that we were having a ceremony. And she said, I'm
13 just -- I'm not going to do it. I'm not casting a vote. I'm not comfortable. I said,
14 Okay.

15 Q Did you encourage her to reconsider?

16 A No. No.

17 Q What about Stanley Grot or Grot? Do you know whether he participated?

18 A I don't remember. I think he did, but I don't remember. I wasn't there.

19 Q Did you ever talk to him about not participating -- him not participating,
20 excuse me?

21 A No, I would not have spoken to Stan Grot.

22 Q Why is that?

23 A I just don't really have a good relationship with him, so --

24 Q Do you know anybody else who was potentially going to participate in the
25 alternate elector voting on December 14th but decided not to?

1 A I can't recall.

2 Q Give me just one moment.

3 One follow-up on the document that you read in the record and that we'll -- you'll
4 be providing to us. Did the Trump campaign have any role in drafting or editing that
5 document?

6 A My ceremonial document?

7 Q Correct.

8 A No. This was some -- well, I don't know, to be quite honest. I don't know
9 where the impetus was. But this is the document that we, "we" being my attorney and
10 myself, decided to move forward with. They had seen -- I think we shared it with them,
11 but I don't know.

12 Q Do you remember what their reaction was to the idea that they -- the
13 electors would just meet, sign this document, and then be done?

14 A I don't think they had a problem with it.

15 Q Did you have a conversation with anybody from the campaign about this
16 document that you can recall?

17 A I don't recall.

18 Q Just one name I'll throw out there to see if it jogs your memory, Shawn
19 Flynn. Do you remember talking to Mr. Flynn about this ceremonial affidavit that you
20 crafted?

21 A I mean, we did have conversations, and it was back and forth, but I don't
22 remember the specifics.

23 Q Did the Trump campaign ask for a copy of this document?

24 A I don't recall.

25 Q Do you know if the document was ever sent to them even if they didn't ask

1 for it?

2 A I don't want to speculate, but I'm sure we shared it with somebody.

3 Q Who do you think you would have shared it with? Who would be the
4 natural person to receive that, based on your experience in that time period?

5 A Probably Flynn and probably somebody -- probably John Black from the RNC.

6 Q Did you have any conversations with Ms. McDaniel about this, about having
7 the electors meet on December 14th?

8 A I think we texted. I don't know that we spoke specifically. I don't
9 remember.

10 Q Do you still have those text messages?

11 A I do.

12 Q Okay. I may have missed them. I know you produced a lot of documents,
13 but I don't think we received those.

14 So, Dave, can that be something we follow up on as well?

15 Mr. Warrington. Yes.

16 BY [REDACTED]

17 Q Is there anybody else that you discussed this plan to -- or excuse me, is there
18 anybody with whom you discussed this plan to have the Trump electors meet and cast
19 votes in Michigan?

20 Mr. Warrington. Hey, [REDACTED] I want to be real clear that it wasn't to cast votes, this
21 meeting, from Ms. Cox's perspective.

22 Mr. [REDACTED]. Understood. Fair enough.

23 BY MR. [REDACTED]

24 Q So anybody else that you discussed this plan for the electors to meet on
25 December 14th?

1 A So it was just my staff, and I mentioned the -- the people I mentioned in this
2 deposition, which was Flynn, Black, and my staff. That's really all. And then I had that
3 call to Shirkey.

4 Q Okay. What about Mr. Zammit, did you talk to him about this plan to have
5 the electors meet?

6 A Well, he's part of my staff, so yes.

7 Q What were his -- what are his thoughts? What did he say to you about it?

8 A About having the meeting?

9 Q Correct.

10 A The ceremonial meeting? I don't know that he had -- I mean, I don't think
11 he had any thoughts. I don't know. He didn't express his thoughts to me. I don't -- I
12 don't remember.

13 Q Did he raise any concerns to you about either the ceremonial meeting or
14 anything else in an effort to have the electors cast votes if they were going to?

15 A About cast -- they didn't cast votes. That wasn't our plan. Our plan was a
16 ceremony. So --

17 Q Understood it was your plan.

18 A But if they were to cast votes, the electors somewhere, I -- I don't think -- I
19 don't know what Tony's thoughts are.

20 Q Okay. And I just want to make sure, because I understand what you're
21 saying and what Mr. Warrington said, that you thought the plan was just to have them
22 meet, the electors meet and do this ceremony. But that came out of concerns that you
23 had about a proposal to have them cast votes, right?

24 A Right.

25 Q Okay. So the -- understood. That's helpful. Thank you.

1 [REDACTED], I see you turned on your camera.

2 And, Ms. Cox, [REDACTED] is senior investigative counsel for the committee as
3 well.

4 BY [REDACTED]

5 Q Hi, Ms. Cox.

6 A Hi.

7 Q Good to see you again. I just want to jump in and clarify one piece of
8 something that [REDACTED] was just asking you about. It sounds like you sent the draft of the
9 statement that you all put together with the lawyer to the Trump campaign before the
10 meeting on the 14th. Did I understand that correctly?

11 Mr. Warrington. I think what she said was she didn't recall, but it was possible
12 that she said it.

13 [REDACTED] Okay.

14 Mr. Warrington. But she didn't -- I think maybe to ask the question whether she
15 sent herself.

16 BY [REDACTED]

17 Q Yeah, and I didn't mean to suggest that Ms. Cox had sent it.

18 But my sense was that you believed a copy had been sent to the Trump campaign.
19 Did I understand that correctly?

20 A I think so. I -- I don't recall doing it, but I -- I don't know.

21 Q Okay. And you didn't recall any specific conversations with anyone from
22 the Trump campaign about the document that you, meaning not you personally but the
23 State GOP, had sent over as to what you were comfortable with?

24 A I don't remember.

25 Q Did you -- do you remember getting any feedback whatsoever that,

1 Hey -- not these exact words but words to the effect of, What you guys sent over isn't
2 going to cut it. We need it to be more sort of -- we need it to be different. We need to
3 actually have them cast votes or somehow push back on the statement that you put
4 together for the ceremonial gathering?

5 A I don't recall, but it would be irrelevant because I was going to have them do
6 the ceremony. That was it.

7 Q Yeah, no, understood. Understood completely. But as we know, and as
8 you saw earlier, they ended up going a different route unbeknownst to you. But I'm
9 curious as to whether beforehand that was signaled to you in any way that someone said,
10 thank you for your input but, you know, this isn't going to work or words to that effect?

11 A I don't recall that.

12 Q Okay. So as you, from your perspective, you believed that whatever was
13 going to happen on that meeting on the 14th, the document that they were going to use,
14 or someone was going to sign would be the document that you and your lawyer had
15 prepared?

16 A Yes.

17 Q And it wasn't until much later that you found out that they did not, that's not
18 the document that they presented to these folks?

19 A Correct.

20 Q Okay. Thank you. I'll stay off camera so as to keep our bandwidth down,
21 but thank you.

22 BY MR. [REDACTED]

23 Q I think we're reaching the end here, but I do want to cover January 6th. So
24 where were you on January 6th, Ms. Cox?

25 A I was in -- I started out in Livonia, went to Lansing, and then I believe I flew

1 out to Florida that night, late afternoon.

2 Q Was that for the RNC meeting in Florida?

3 A Yes.

4 Q Okay. Not in D.C. at any point on the 6th?

5 A No. No.

6 Q We covered the buses. I do want to bring up exhibit No. 27, please. This
7 is a document you provided to us, Ms. Cox, from Michael Banerian to you, copying
8 Mr. Ambrosini and Mr. Zammit, subject: "Cox statement on electoral certification, press
9 release for review." And Mr. Banerian says they had approved a statement about the
10 electoral certification but wanted to run it by you, and then attached is exhibit No. 26.

11 A Is that at 4:00 Michigan time? Or I don't understand your date stamps.

12 Q Yeah. If we go back, that's actually UTC time, so 5 hours earlier. That's
13 going to be 11:00, I believe, so 11:00 a.m.

14 A In the a.m.?

15 Q That's correct.

16 A Okay.

17 Q Does that make sense to you looking at it now?

18 A Yes, the 4:00 seemed really weird, so I was like all right.

19 Q Okay. Yeah. So if we go to exhibit No. 26, this is the attachment to it. If
20 you zoom out a bit, it says, Cox statement on electoral certification from January the 6th.
21 Do you remember working on a statement that you were going to release on January
22 the 6th?

23 A I didn't work on that. Tony must have written it.

24 Q Do you remember approving it?

25 A No.

1 Q Do you remember putting out a statement at all on the 6th?

2 A We didn't put this statement out, I'm pretty confident.

3 Q Okay. Why -- was there something about this statement that you didn't
4 want to put out?

5 A It wasn't this statement, it was just that day I had announced that I wasn't
6 running for reelection earlier in the day. So we were just setting that aside for a time
7 being and going to revisit it, and then we never revisited it because of, you know, what
8 had transpired.

9 Q What had transpired, meaning what?

10 A The activities at the Capitol.

11 Q At the U.S. Capitol?

12 A Yes. Yes, sorry.

13 Q Okay. No, I'm just trying to be clear for the record.

14 So this says, this draft says, I'd like to thank the hundreds of thousands of patriots
15 who came out today to fight for fair, free, and open elections. Our Nation works
16 because people have had faith in our electoral system. Any irregularities which breach
17 that trust should be thoroughly investigated, and I encourage Congress to do so.

18 So in this process, do you know what Mr. Zammit or others drafting this was
19 referring to by the hundreds of thousands of patriots who came out today?

20 A There was supposed to be a rally at the Capitol -- or not at the Capitol, I'm
21 sorry, at the -- there was a rally in Washington, D.C. And so I believe that's what he
22 would be referring to, but I don't want to speculate. I didn't draft it. And, quite
23 frankly, I'm pretty -- 99 percent certain we did not release it.

24 Q Okay. Do you remember getting any outreach from the campaign or the
25 President or the White House asking the Michigan GOP to put out a statement about the

1 rally on the Ellipse?

2 A I don't. I don't recall any, no.

3 Q Okay. Do you remember that being a topic of conversation within the
4 Michigan GOP, this rally on the Ellipse?

5 A We weren't involved with that rally.

6 Q So do you know why you put a -- or somebody would draft a statement
7 about that rally?

8 A Because the President was going to speak at it, I believe, and it was
9 occurring.

10 Q Do you know what the reference to "fighting for fair, free, and open
11 elections" means?

12 A It's people speaking up, speaking, you know -- expressing their First
13 Amendment rights to talk about things that they're concerned about as citizens.

14 Q Was there any information that you were aware of or heard about even
15 secondhand with respect to potential violence in Washington, D.C. on the 6th?

16 A Absolutely not.

17 Q Did you ever hear about any efforts to protest inside the Capitol on
18 January the 6th, so not just around the Capitol, but inside the U.S. Capitol?

19 A I did not.

20 Q Do you remember anybody talking about it afterwards that there had been
21 these plans? And I'm not talking about what's been reported publicly or stuff you only
22 heard from the press, but directly to you, that you were told by anybody that there had
23 been plans to go inside the Capitol or commit acts of violence in Washington on the 6th?

24 A No.

25 Q I'll stop there and see if anybody has any questions -- only Mr. [REDACTED] -- about

1 anything related to the 6th.

2 Mr. [REDACTED] No. Thank you.

3 BY MR. [REDACTED]

4 Q Okay. Last question or set of questions for you, Ms. Cox, is exhibit No. 28,
5 page 12, and this is your tweets, number 19. In February you tweeted out -- there,
6 February 5th, it says, Please see the investigative report below, and it had a link to a
7 report that the Michigan Senate, specifically Senator McBroom, had authored about the
8 report on the election.

9 Do you remember tweeting out a link to this report?

10 A Is that what that is? I don't know what that is.

11 Q Yep. I'll represent to you that it is number -- if we go to the next page.

12 A Oh, okay.

13 Q This is the first page of it.

14 A Okay.

15 Q And then we do have the entire exhibit if you'd like to see it.

16 A Okay. I just couldn't see from that what it was.

17 Q Yep. Do you remember tweeting out the link to this report?

18 A I do not. I might have had somebody do that for me.

19 Q Do you remember what this report is, that Mr. -- or excuse me, Senator
20 McBroom authored?

21 A Yeah, it's the Senate Oversight Committee, their report on their
22 election -- the 2020 election.

23 Q One of the things in the intro to that report that Mr. McBroom writes is that
24 the committee found no evidence of widespread or systemic fraud in Michigan's
25 prosecution of the 2020 election. And then he says, At this point, I feel confident to

1 assert the results of the Michigan election are accurately represented by the certified and
2 audited results.

3 And then in another place, it says, All compelling theories that sprang forth from
4 the rumors surrounding Antrim County -- and that's an in particular reference to Antrim
5 County. It goes on and says, are diminished so significantly as for it to be a complete
6 waste of time to consider them further.

7 Is there any information that you have that establishes otherwise, that suggests
8 Mr. McBroom's conclusions are not correct?

9 A No.

10 Q Did you tweet this out because you agreed with the conclusions in Senator
11 McBroom's report?

12 A I was sharing the report for people to come to their own conclusions and see
13 what the Senators -- their conclusions.

14 Q Okay. I'll stop there and see if -- Mr. [REDACTED] do you have any questions?

15 Mr. [REDACTED] I don't.

16 Mr. [REDACTED] All right. Well, Ms. Cox, at this point, there's -- I know we've gone
17 over quite a bit. If there's anything else that you think that's important for the
18 committee to understand or consider as we go through our work, we'll certainly give you
19 the opportunity and tell us, or anything that we haven't covered and you'd like to tell us
20 or, finally, if there's anything that you'd like to go back and kind of correct or restate at
21 this point. So the floor is yours for any of that, if you'd like to say anything further.

22 The Witness. No. I just defer to my attorneys to get you that document,
23 the -- my document, the ceremonial document, and to follow up with the tweets as well.

24 Mr. [REDACTED] Okay. And I'd also give your attorneys, Mr. Warrington, Mr. Cox,
25 Mr. Columbo, an opportunity to put anything on the record before we go off.

1 Mr. Warrington. We don't have anything, [REDACTED] And thank you for your
2 professionalism today, as always.

3 Mr. [REDACTED] Appreciate it. Thank you. Then at this point, we can go off the
4 record and close the deposition.

5 [Whereupon, at 1:13 p.m., the deposition was concluded.]

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Certificate of Deponent/Interviewee

I have read the foregoing ____ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

Witness Name

Date